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October 4, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307, Ex Parte #3

Dear Ms. Dortch

This is to inform you that on October 2, 2002 and October 3, 2002, BellSouth made a series of presentations and demonstrations relating to its Operation Support Systems, or OSS, and the performance metrics that measure BellSouth's success in making those systems available to CLECs on a non-discriminatory basis to Greg Cooke, Christine Newcomb, John Minkoff, and Josh Swift of the Wireline Competition Bureau. The presentations, made at the staff's request, included a demonstration of BellSouth's Telecommunications Access Gateway, or Tag, as well as tours of the Atlanta Local Carrier Service Center ("LCSC"), the Atlanta Customer Wholesale Interconnection Services, or CWINS, Center, and BellSouth's Courtland Street Wire Center in Atlanta. The tours were interspersed with presentations describing the operation of the LCSC, the provisioning and maintenance and repair functions performed or coordinated at the CWINS centers, the metrics and related reports documenting BellSouth's OSS performance, and the manner in which BellSouth provides collocation to CLECs. The attached documents formed the basis for those presentations.

Participating in the demonstrations and presentations on behalf of BellSouth on both days were: Gay Dilz; Steve Inman; Ron Pate; Janet Miller Fields; Ken Ainsworth; Glenn Reynolds and I. Keith Milner led the tour of the Courtland Street wire center. During the tour of the LCSC, and Debra Anderson explained the operations of the UNE group within the LCSC; Liz Hill explained the operations of the Resale Group; and Sabrina Brisendine demonstrated the tasks performed in the Complex Group. Diane Strickland and Janet Miller-Fields explained the overall operation of the Centers. At the CWINS center, Bill Stacy, Frank Batusic and Brandon Hartley led the tour and explained the roles of the

different work groups in the Center. Donald Tremblay demonstrated how staff coordinated a hot cut, Barry Fisher explained how the Chronic Troubles Group identified the cause of partial, recurring outages on CLEC circuits, and Sharon Ritter demonstrated how CWINS center staff handled CLEC trouble reports.

In accordance with governing Commission rules, I am filing this notice and attachments electronically and request that you place them in the record of the proceeding identified above. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Kathleen B. Levitz". The script is cursive and fluid, with the first name being the most prominent.

Kathleen B. Levitz

Attachments

cc:	Greg Cooke (w/o attachments)	John Minkoff (w/o attachments)
	Christine Newcomb (w/o attachments)	Josh Swift (w/o attachments)
	Janice Myles	James Davis-Smith
	Luin Fitch	Sara Kyle
	Beth Keating	

ATTACHMENT A

BellSouth's Service Quality Measurements

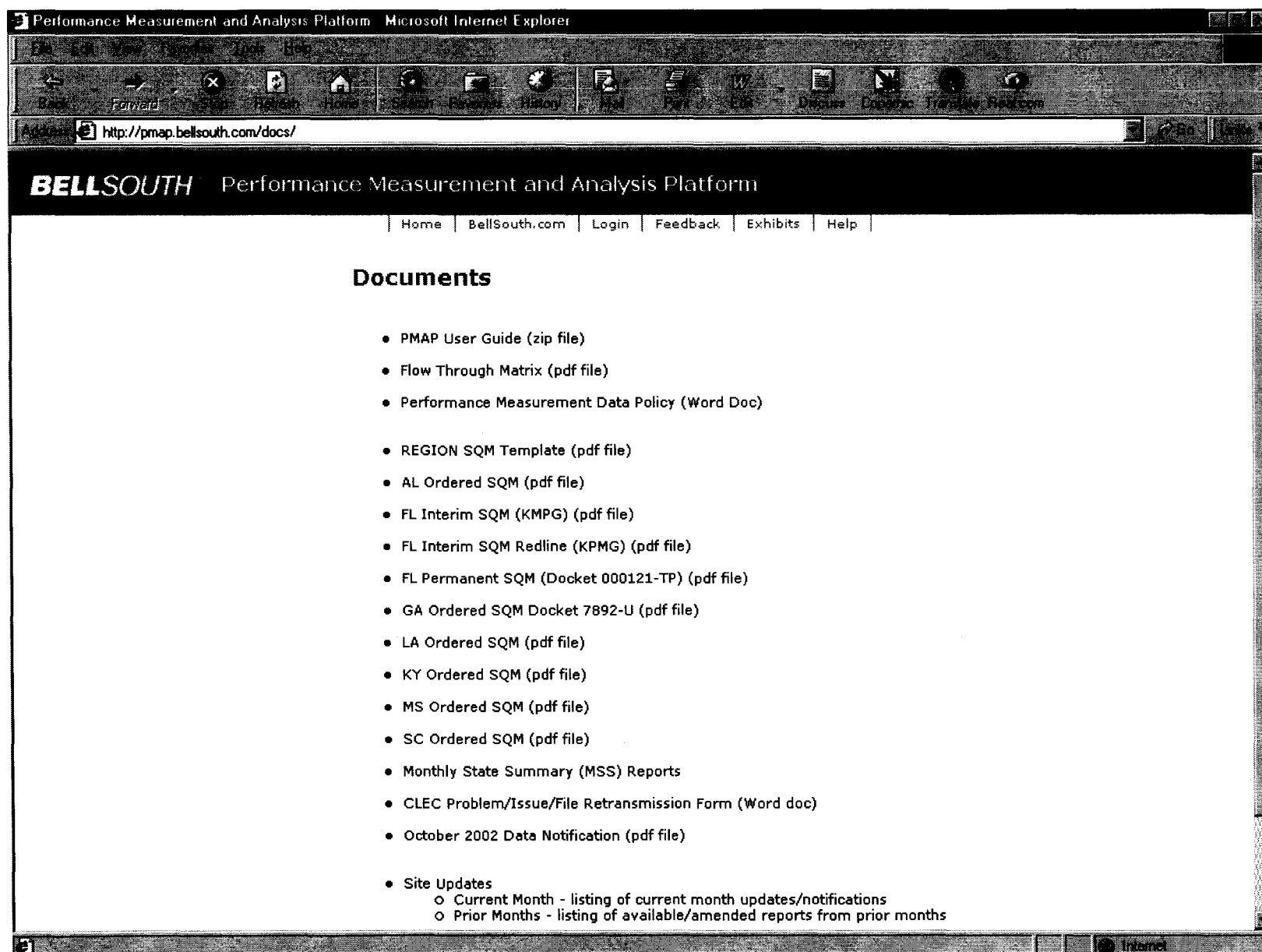
The System used to collect and report the data is PMAP -
the Performance Measurements Analysis Platform

These metrics are produced monthly in three formats for the
PSCs and CLECs (data appears on the PMAP website):

- Individual CLEC results and raw data and CLEC aggregate results
- Monthly State Summary (MSS) – Monthly aggregate CLEC results, benchmarks, and retail analogs; z-score
- Monthly Charts - a graphic display of the MSS data for multiple months

Data from these formats is combined in various ways for our FCC Filings.

FL/TN filed data are based on the Georgia SQM



Performance Measurement and Analysis Platform Microsoft Internet Explorer

http://pmap.bellsouth.com/docs/msreports.asp

BELLSOUTH Performance Measurement and Analysis Platform

Home | BellSouth.com | Login | Feedback | Exhibits | Help

Monthly State Summary (MSS) Reports

Monthly State Summary	MSS Charts	Notes
Alabama (July 2002 data)	1,837KB compressed file (charts are in Excel format)	
Florida (August 2002 data)	2,005KB compressed file (charts are in Excel format)	
Georgia (August 2002 data)	1,980KB compressed file (charts are in Excel format)	
Kentucky (July 2002 data)	1,791KB compressed file (charts are in Excel format)	
Louisiana (Jul 2002 data)	1,857KB compressed file (charts are in Excel format)	
Mississippi (July 2002 data)	1,815KB compressed file (charts are in Excel format)	
North Carolina (July 2002 data)	1,865KB compressed file (charts are in Excel format)	
South Carolina (July 2002 data)	1,813KB compressed file (charts are in Excel format)	
Tennessee (August 2002 data)	1,906KB compressed file (charts are in Excel format)	

The MSS report contains monthly aggregate totals for CLEC performance volumes for Resale, Unbundled Network Elements (UNE), Local Interconnection Trunks, Operations Support Systems (OSS), Collocation, and General categories. It also provides the BellSouth comparable volumes and statistical test results, where applicable. Each month the current report will be updated with the succeeding month's report.

The MSS charts contain the underlying data summarized in the MSS.

Additional state reports and charts will be added when available.

Confidential/Proprietary: Contains private and/or proprietary information. May not be used or disclosed outside the BellSouth companies except pursuant to a written agreement. Copyright © 2002. PMAP Web Delivery 3.0402.01

The Monthly State Summary consists of 6 categories:

- RESALE
- UNE (Unbundled Network Elements)
- LIT (Local Interconnection Trunks)
- OSS (Operations Support Systems)
- COLLOCATION
- GENERAL

- Resale and UNE are divided into:
 - Ordering
 - 15 measures
 - Up to 34 products and other disaggregations per measure
 - Provisioning
 - 20 measures for Resale, 29 measures for UNE
 - Up to 76 products and other disaggregations per measure
 - Maintenance and Repair
 - 5 measures
 - Up to 24 products and other disaggregations per measure
 - Billing
 - 2 measures
 - 1 disaggregation per measure

- LIT is divided into:
 - Ordering
 - 5 measures
 - 1 disaggregations per measure
 - Provisioning
 - 10 measures
 - Up to 4 disaggregations per measure
 - Maintenance and Repair
 - 5 measures
 - 2 disaggregations per measure
 - Billing
 - 2 measures
 - 1 disaggregations per measure
 - Trunk Blocking
 - 1 measure
 - 1 disaggregations

- OSS is divided into:
 - Pre-Ordering
 - 4 measures
 - Up to 14 products and/or disaggregations per measure
 - Maintenance and Repair
 - 6 measures
 - Up to 11 products and/or disaggregations per measure
- Collocation is divided into
 - 3 measures
 - Up to 5 products and/or disaggregations per measure

- General is divided into:
 - Flow Through
 - Pre-Ordering
 - Ordering
 - Maintenance Center
 - Operator Services
 - Directory Assistance
 - E911
 - Billing
 - Change Management
 - New Business Requests
 - Database Updates
 - Network Outage Notification

Finally, the groups are divided into the individual metrics and products (creating sub-metrics) (generally following the flow of a CLEC Local Service Request through the ordering and provisioning systems).

For example, UNE Provisioning is subdivided into:

- Order Completion Interval
- Order Completion within X days (xDSL)
- Held Orders
- % Jeopardies
- Average Jeopardy Notice Interval
- % Jeopardy Notice \geq 48 hours
- Coordinated Customer Conversions (duration)
- HotCut timeliness (3 metrics)
- Average Recovery Time – CCC
- % Provisioning Troubles in 7 days – CCC
- % Missed Installation Appointments
- % Provisioning Troubles within 30 days
- Average Completion Notice Interval
- Total Service Order Cycle Time
- % Completion without Notice or $<$ 24 hours
- % Cooperative Test attempts for DSL
- Service Order Accuracy

Each line of the sub-metrics is identified with a unique number as a guide and reference point. i.e., UNE – Provisioning – Order Completion Interval – Loop and Port Combinations / <10 circuits per order Non-Dispatched is assigned Reference Number B.2.1.3.1.2

Florida MSS Sample

BellSouth Monthly Performance Summary Florida, April 2002

		Benchmark / Analog	BST Measure	BST Volume
Unbundled Network Elements - Provisioning				
Order Completion Interval				
B.2.1.1.1.1	P-4 Switch Ports/<10 circuits/Dispatch/FL(days)	R&B (POTS)	3.71	75,771
B.2.1.1.1.2	P-4 Switch Ports/<10 circuits/Non-Dispatch/FL(days)	R&B (POTS)	0.91	647,694
B.2.1.1.2.1	P-4 Switch Ports/>=10 circuits/Dispatch/FL(days)	R&B (POTS)	8.28	310
B.2.1.1.2.2	P-4 Switch Ports/>=10 circuits/Non-Dispatch/FL(days)	R&B (POTS)	3.69	17
B.2.1.2.1.1	P-4 Local Interoffice Transport/<10 circuits/Dispatch/FL(days)	DS1/DS3	16.34	2,497
B.2.1.2.1.2	P-4 Local Interoffice Transport/<10 circuits/Non-Dispatch/FL(days)	DS1/DS3		
B.2.1.2.2.1	P-4 Local Interoffice Transport/>=10 circuits/Dispatch/FL(days)	DS1/DS3		
B.2.1.2.2.2	P-4 Local Interoffice Transport/>=10 circuits/Non-Dispatch/FL(days)	DS1/DS3		
B.2.1.3.1.1	P-4 Loop + Port Combinations/<10 circuits/Dispatch/FL(days)	R&B	3.72	76,533
B.2.1.3.1.2	P-4 Loop + Port Combinations/<10 circuits/Non-Dispatch/FL(days)	R&B	0.91	650,322
B.2.1.3.1.3	P-4 Loop + Port Combinations/<10 circuits/Switch Based Orders/FL(days)	R&B	0.33	384,002
B.2.1.3.1.4	P-4 Loop + Port Combinations/<10 circuits/Dispatch In/FL(days)	R&B	1.75	266,320
B.2.1.3.2.1	P-4 Loop + Port Combinations/>=10 circuits/Dispatch/FL(days)	R&B	9.00	378
B.2.1.3.2.2	P-4 Loop + Port Combinations/>=10 circuits/Non-Dispatch/FL(days)	R&B	3.31	218
B.2.1.3.2.3	P-4 Loop + Port Combinations/>=10 circuits/Switch Based Orders/FL(days)	R&B	0.33	68
B.2.1.3.2.4	P-4 Loop + Port Combinations/>=10 circuits/Dispatch In/FL(days)	R&B	4.67	150
B.2.1.4.1.1	P-4 Combo Other/<10 circuits/Dispatch/FL(days)	R&B&D - Disp	4.35	79,626
B.2.1.4.1.4	P-4 Combo Other/<10 circuits/Dispatch In/FL(days)	R&B&D - Disp	4.35	79,626
B.2.1.4.2.1	P-4 Combo Other/>=10 circuits/Dispatch/FL(days)	R&B&D - Disp	9.71	400
B.2.1.4.2.4	P-4 Combo Other/>=10 circuits/Dispatch In/FL(days)	R&B&D - Disp	9.71	400
B.2.1.6.3.1	P-4 UNE ISDN/<6 circuits/Dispatch/FL(days)	ISDN - BRI	12.75	312
B.2.1.6.3.2	P-4 UNE ISDN/<6 circuits/Non-Dispatch/FL(days)	ISDN - BRI	2.15	304

- Each Sub-metric has been designated for comparison to a benchmark, a retail analog (using the z-score), as Parity by Design, or as a diagnostic measure

VERSIONS OF DATA

- FL/TN data per Georgia SQM
 - Filed with Application
 - Used by FL/TN PSC
- FL data per Interim FL SQM
 - Almost same as above (Collocation and Change Management standards)
 - Also used by FL for decision
- FL data per FL Permanent SQM
 - Began with May data
 - Not relied on by BST or FPSC for 271

Data Integrity

- The data is produced by my team. To the best of our professional knowledge it is without substantial error.
- The KPMG audit is on-going in Georgia and Florida. Results from the September, 2002 Interim Status Reports are shown on the following slides (Varner Affidavit, Exhibits PM-15 & PM-27)
- No significant data integrity issues in data filed for application.

PMR 1 - Data Collection and Storage

All tests pertaining to the PMR 1 criteria for PMAP 2.6 environment have been completed, and the evaluation criteria satisfied.

All tests being refreshed during the PMAP 4.0 testing to ensure that the evaluation criteria continue to be satisfied. No open or closed exceptions.

PMR 2 - Standards and Definitions

Thus, for the PMAP 2.6 environment, 97% of the metrics have been successfully reviewed.

For the PMAP 4.0 environment, the 74 metrics were successfully reviewed for two months with two metrics being reviewed for a third month. No open exceptions.

PMR 3 - Change Management

This test is currently complete for the PMAP 2.6 environment, with all evaluation criteria satisfied. Same process subject to PMAP 4.0 monitoring for adherence-to-process for duration of testing. No open exceptions.

PMR 4 - Data Integrity

Of the 37 metrics where testing had started in Audit III, or completed in Audits I or II, 20 (or 54%) had satisfied the evaluation criteria and were completed.

Currently being conducted for 73 GA metrics; Accuracy: 50 complete, Completeness: 51 complete, 14 open exceptions, with none significant per Exhibit PM-17.

PMR 5 - Replication - SQM Reports

In summary, for the PMAP 2.6 environment, 91% of the metrics quoted in the 271 Charts that can be evaluated for replicability have been successfully replicated for three months.

In the PMAP 4.0 environment.74 metrics were reviewed, 63 were complete in at least one month. There are 14 open exceptions, with none significant per Exhibit PM-17.

ATTACHMENT B

MEMORANDUM

As explained in the Varner Affidavit, Florida has three different measurement plans in play:

- (1) Florida data under Georgia measurements
- (2) Florida data under "Florida Interim" measurements in TPT
- (3) Florida permanent measures

The first two measurement plans are, for all intents and purposes, identical. BellSouth filed the MSS (based on Georgia measures and identical to the MSS used in the other 7 states) with the FPSC and KPMG for purposes of the TPT and the Commission's assessment of Section 271 compliance. BellSouth began reporting data under the Florida permanent measures (plan 3) in May 2002. While this data is reported, it was not the basis of the FPSC's 271 decision. Nevertheless, BellSouth has provided that data, in a newly-created MSS format, to the FCC at the Staff's request.

The following quotes provide citations from the Varner affidavit and the Florida record substantiating the above discussion.

Varner Affidavit:

Para 5: "Both the Florida Public Service Commission and the TRA were provided data in accordance with [the Georgia SQM] as the means by which they would evaluate BellSouth's compliance with Section 271. Thus, the data provided in this application, for Florida and Tennessee, are based on the same SQM used by this Commission to evaluate BellSouth's performance in [seven other states]."

Para 16: "While the FPSC and the TRA each adopted a specific set of performance measurements and enforcement mechanisms for use on a permanent basis in the respective states, both state commissions were provided data based on the Georgia SQM for 271 purposes."

Para 69: "...BellSouth has created a user-friendly summary of BellSouth's CLEC aggregate performance data called the Monthly State Summary ("MSS"). The MSS is produced pursuant to the Georgia SQM. BellSouth provides the MSS in Florida and Tennessee. It is the same MSS format that BellSouth filed in support of its Georgia/Louisiana and Five State applications."

Para 123: "BellSouth provided data consistent with the Georgia SQM to both the FPSC and the TRA to assist these state regulatory bodies in evaluating BellSouth's Section 271 compliance. In addition, the FPSC also was provided with data based on the Interim Florida SQM used by KPMG for the third party audit in Florida. As described later in this affidavit, the differences between the Georgia SQM and the Interim Florida SQM are very minor."

Para 108: "The only differences between the Florida Interim Metrics used for the third party test in Florida and the Georgia metrics relate to minor changes in some standards and/or levels of disaggregation in the collocation and change management measures...." [Chart setting forth differences in same paragraph]

Para 156: "The Florida Commission opened Docket No. 000121-TP to develop permanent performance metrics for monitoring and evaluating BellSouth's Operations Support Systems (OSS), as applied to competitive LECs, and an enforcement program to ensure that CLECs receive nondiscriminatory access to BellSouth's OSS."

Para 157: "...the FPSC issued Order No. PSC-02-0187-FOF-TP on February 12, 2002, adopting BellSouth's [Performance Assurance Plan]. BellSouth implemented the PAP and began penalty payments in July 2002, for May 2002 data results."

Para 158-168: Describes the differences between Georgia measures and Florida permanent measures.

FPSC Consultative Opinion (OSS):

Page 8: "By Order No. PSC-00-2451-PAA-TP, issued December 20, 2000, we approved revised interim performance measures, benchmarks and retail analogs to be used during the third-party OSS testing. The revised interim measures were ordered to address several changes made to BellSouth's initial set of interim measures approved by Order No. PSC-00-0260-PAA-TP...Since Order No. PSC-00-2451-PAA-TP, BellSouth has issued additional changes to its revised interim measures in other jurisdictions. By Order No. PSC-01-1428-PAA-TL, issued July 3, 2001, we approved additional changes to update measures and retail analogs and provide additional levels of disaggregation."

[Interim measures referenced here are the Georgia measures but for the minor differences in collocation and change management measures cited above]

Page 9: "The three legs of the stool, to be used to determine BellSouth's compliance with the requirements of Section 271 of the Telecommunications Act, are as follows:

- The results of the OSS third-party test conducted by KPMG Consulting, Inc.;
- *January 2002 through March 2002 commercial data results showing the quality of OSS support provided to ALECs by BellSouth in terms of its performance against our approved OSS benchmarks and analogs; and*
- Input regarding ALECs' 'real world' experience via the February 18, 2002 ALEC Experience Workshop and comments filed in this docket."

(Emphasis added).

[The data referenced in this paragraph is the Georgia measures but for the minor differences in collocation and change management measures cited above. BellSouth provided KPMG the Georgia MSS for KPMG's analysis].

Pages 35-40: "BellSouth's commercial data covers many aspects of the services and facilities that BellSouth provides to ALECs under the 1996 Telecommunications Act. *The commercial data used in this analysis was obtained from BellSouth's published Monthly State Summary (MSS) report which contains both BellSouth retail and ALEC aggregate state-level performance results.* The majority of the MSS values are produced in BellSouth's Performance Measurement Analysis Platform (PMAP) system. The remainder are calculated manually by BellSouth."

"The performance data results were then compared by KPMG Consulting to benchmarks or retail analogs mandated by us, as appropriate, to determine whether BellSouth is providing parity of service to ALECs. Additionally, as part of Docket 960786B-TL and 981834-TP, on a monthly basis, BellSouth files an assessment of the MSS data. Each submeasurement designated as failing to satisfy the benchmark or retail analog is included in the filing."

[KPMG used the MSS based on the Georgia measures].

"Our detailed analysis of the commercial data results organized by domain is provided below. The information is offered as one tool to be used in analyzing whether BellSouth has met its commercial performance commitments. We also considered data from additional months (April, May 2002) as it became available."

[FPSC is referring to the April/May MSS based on Georgia measures].

Page 52: "We believe the commercial data analysis performed by KPMG Consulting generally confirms the OSS test results. Further, the analysis supports the conclusion that BellSouth is providing nondiscriminatory access to its OSS. Additionally, we believe these results show that BellSouth is providing the necessary documentation and support functions, has demonstrated that its systems are operationally ready, and provide an appropriate level of performance."

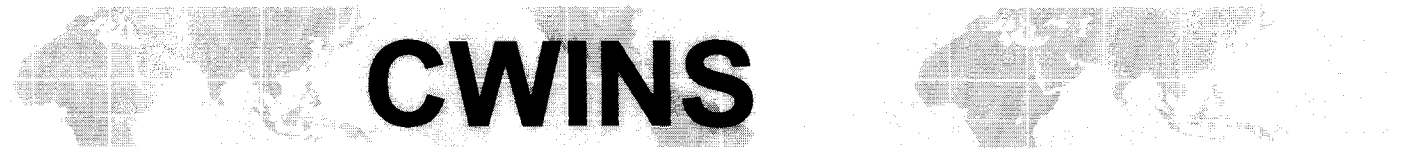
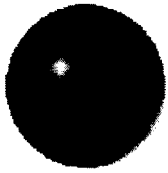
[FPSC relied on MSS based on Georgia measurements].

FPSC Order No. PSC-02-0187-FOF-TP (Permanent performance measures)

Page 1: "We opened this docket to develop permanent performance metrics *for the ongoing evaluation of operations support systems (OSS) provided for alternative local exchange carriers' (ALECs) use by incumbent local exchange carriers (ILECs).* Associated with the performance metrics is a monitoring and enforcement program that is to ensure that ALECs receive nondiscriminatory access to the ILEC's OSS. Performance monitoring is necessary to ensure that ILECs are meeting their obligation to provide unbundled access, interconnection and resale to ALECs in a nondiscriminatory manner.

Additionally, it establishes a standard against which ALECs and this Commission can measure performance over time to detect and correct any degradation of service provided to ALECs.”

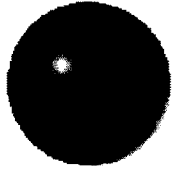
ATTACHMENT C



CWINS
Customer Wholesale Interconnection Network
Service Center

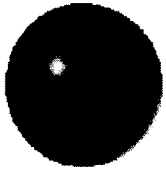
Welcome
Federal Communications
Commission Staff

Presented by: Ken Ainsworth
10-02-02

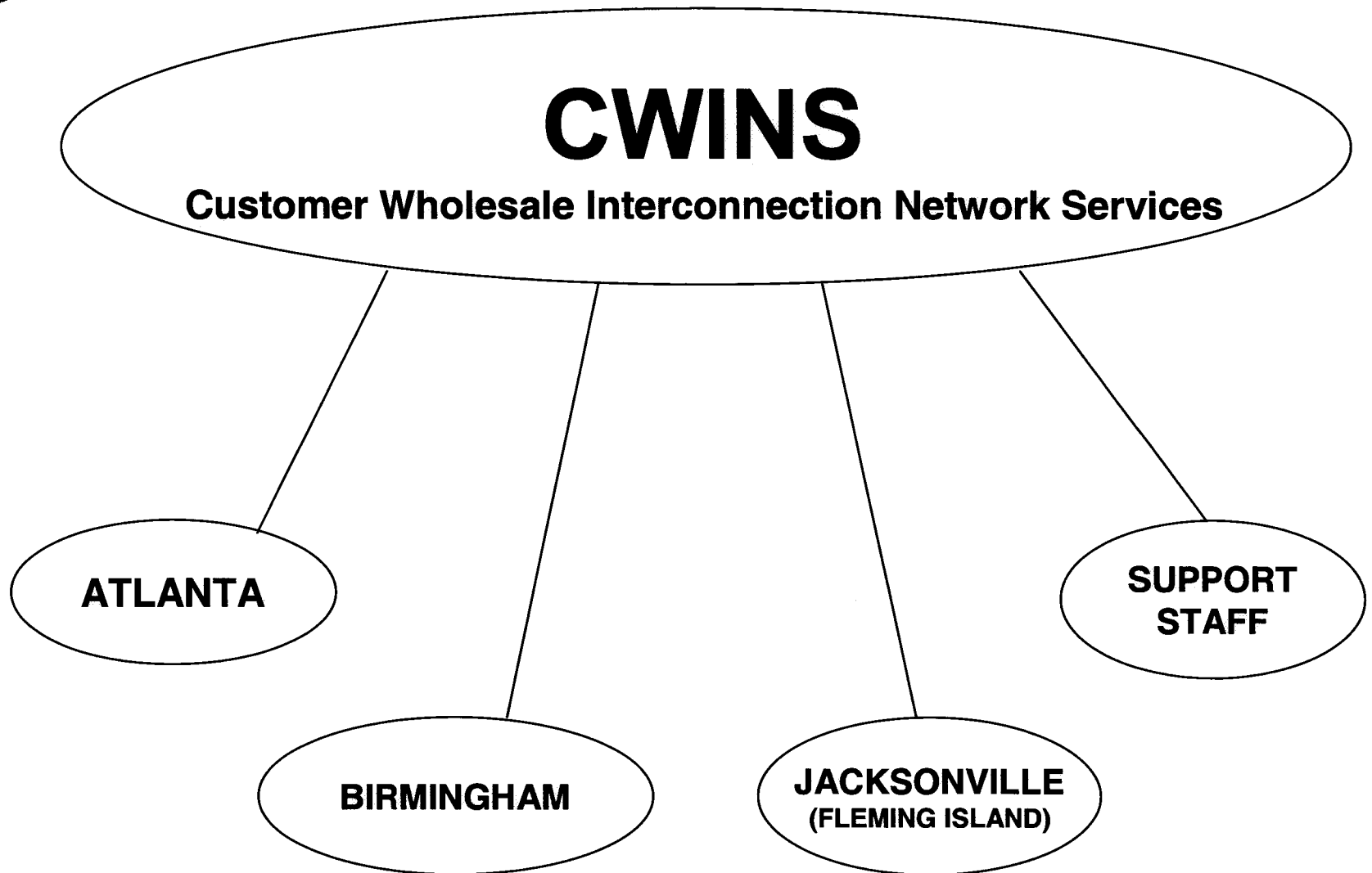


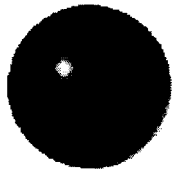
CWINS Overview

- Logistics
- Organizational Structure
- Staffing
- Responsibilities
- Operational Structure
- Provisioning
- “Hot Cut”
- Maintenance
- Quality
- Speciality Groups
- Measures of Success
- Summary
- Acronyms
- CWINS Tour

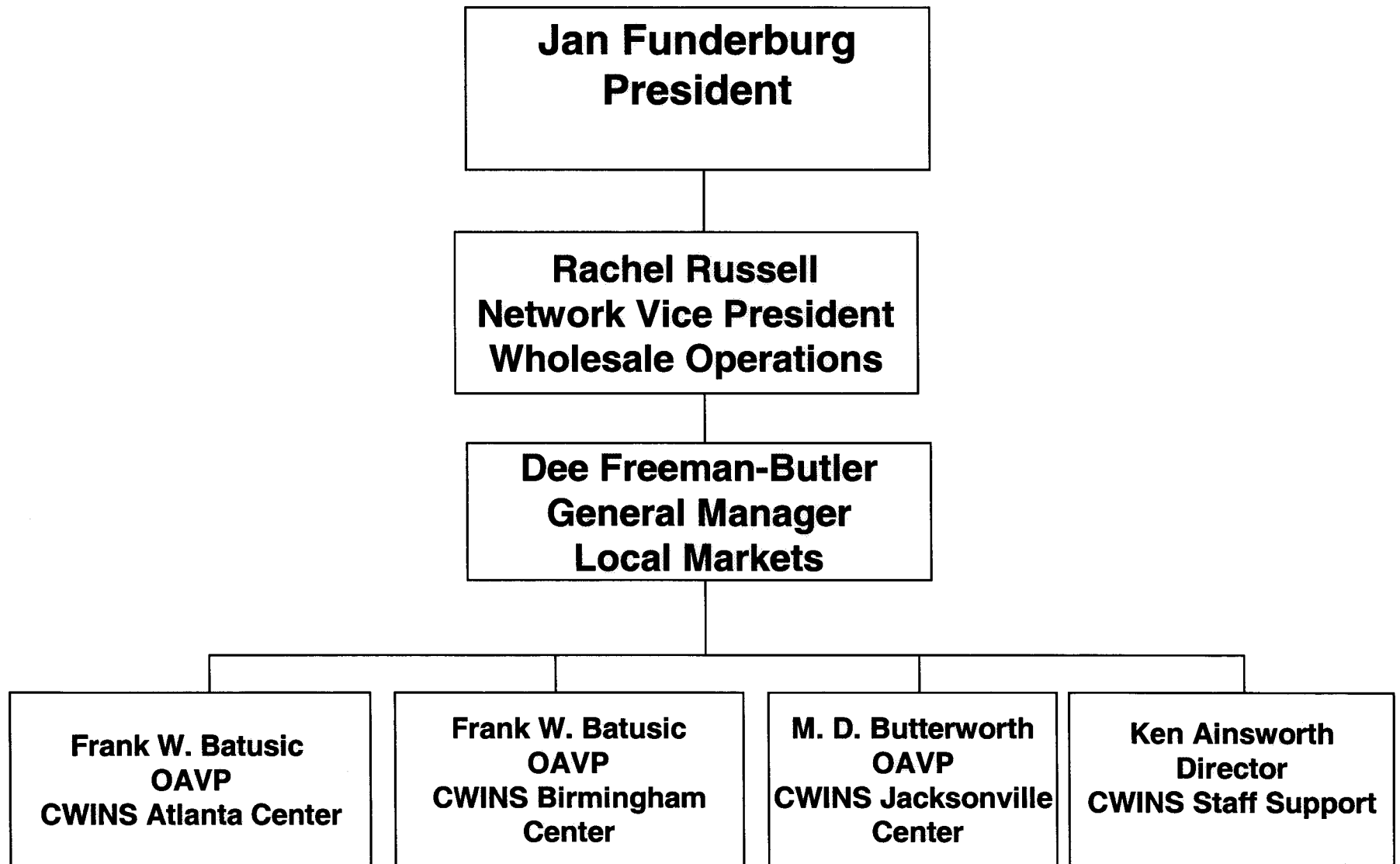


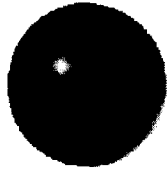
Logistics





Departmental Organizational Chart

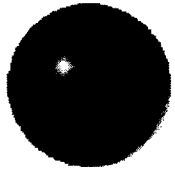




CWINS STAFFING

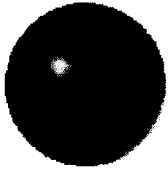
8-31-02

- ***Atlanta CWINS*** Mgt. - 49
Craft - 375
- ***Birmingham CWINS*** Mgt. - 47
Craft - 302
- ***Jacksonville CWINS*** Mgt. - 19
Craft - 143
- ***Total CWINS Staffing*** 935
- ***Total Wholesale CLEC
Support Staffing*** 2,262



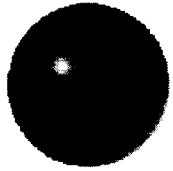
CWINS RESPONSIBILITIES

- ***Provisioning*** of CLEC coordinated Resale/UNE services
- ***Maintenance*** of all CLEC Resale/UNE services.
- ***Interfaces*** with BellSouth network operations groups utilizing identical methods and procedures to complete CLEC provisioning and maintenance work activities.
- ***Single Point of Contact*** dedicated for CLEC customers for provisioning and maintenance functions.



CWINS Operational Structure

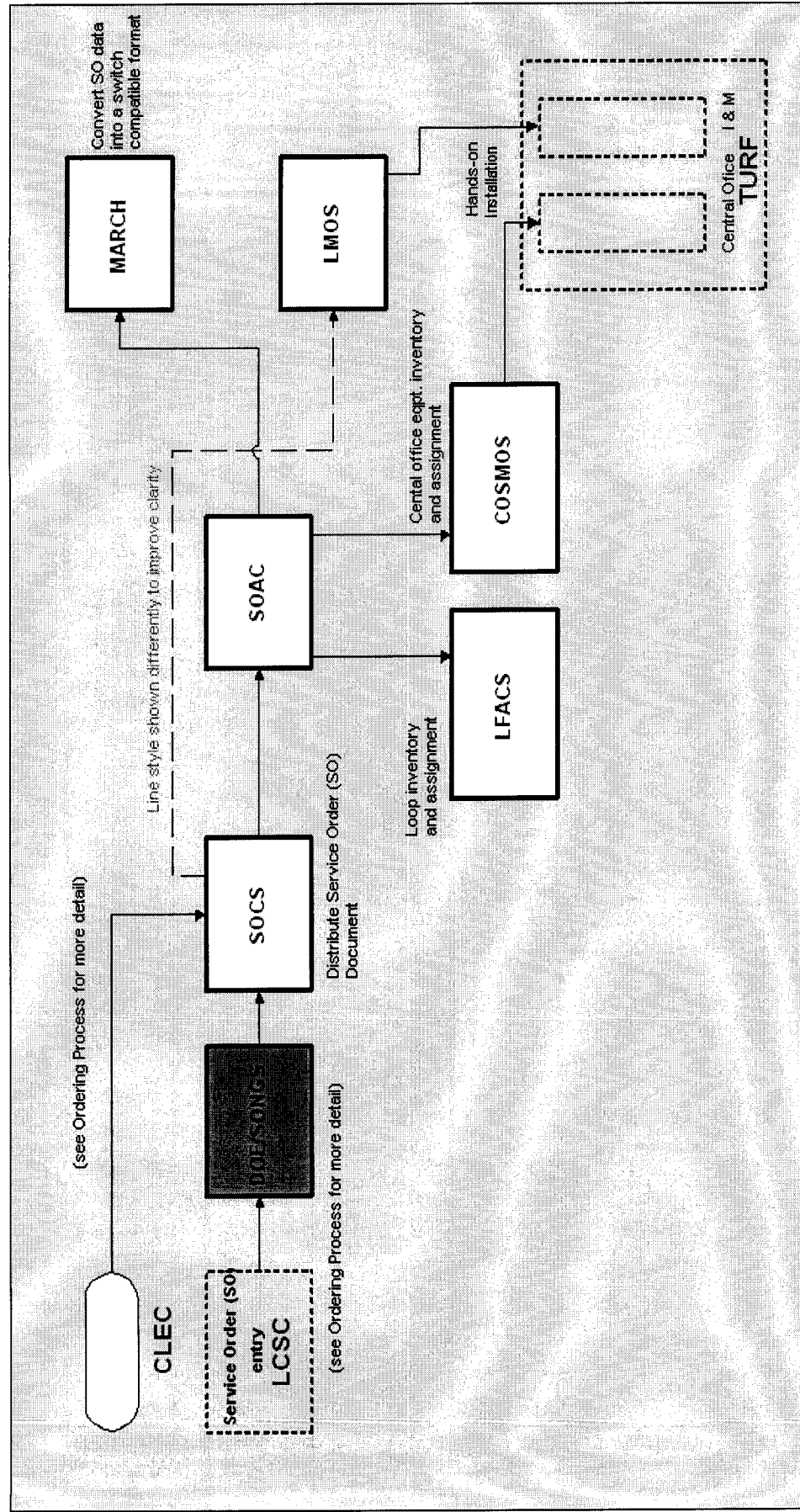
- *CLEC specific*
- *Atlanta*
 - Resale Provisioning
 - UNE Provisioning
 - Resale Maintenance
 - UNE Maintenance
- *Birmingham*
 - UNE Provisioning
 - UNE Maintenance
- *Jacksonville*
 - UNE Provisioning
 - UNE Maintenance
- *Uniform Processes*
 - Corporate Document Information Access (CDIA)
 - ISO 9002



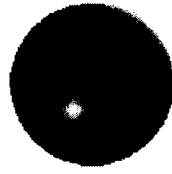
CWINS Provisioning Functions

- ***Available 8 a.m. - 5 p.m. M-F coordinated services***
8 a.m. - 5 p.m. M-Sat non-coordinated services
- ***SCREENING***
- ***PRE-TESTING***
- ***COORDINATION***
- ***DUE DATE TURN-UP PROCESSING***
- ***CLEC NOTIFICATION***
- ***ORDER COMPLETION***

MECHANIZED NON-DESIGN PROVISIONING FLOW -ORGANIZATIONS / CENTERS -

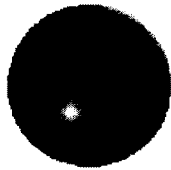




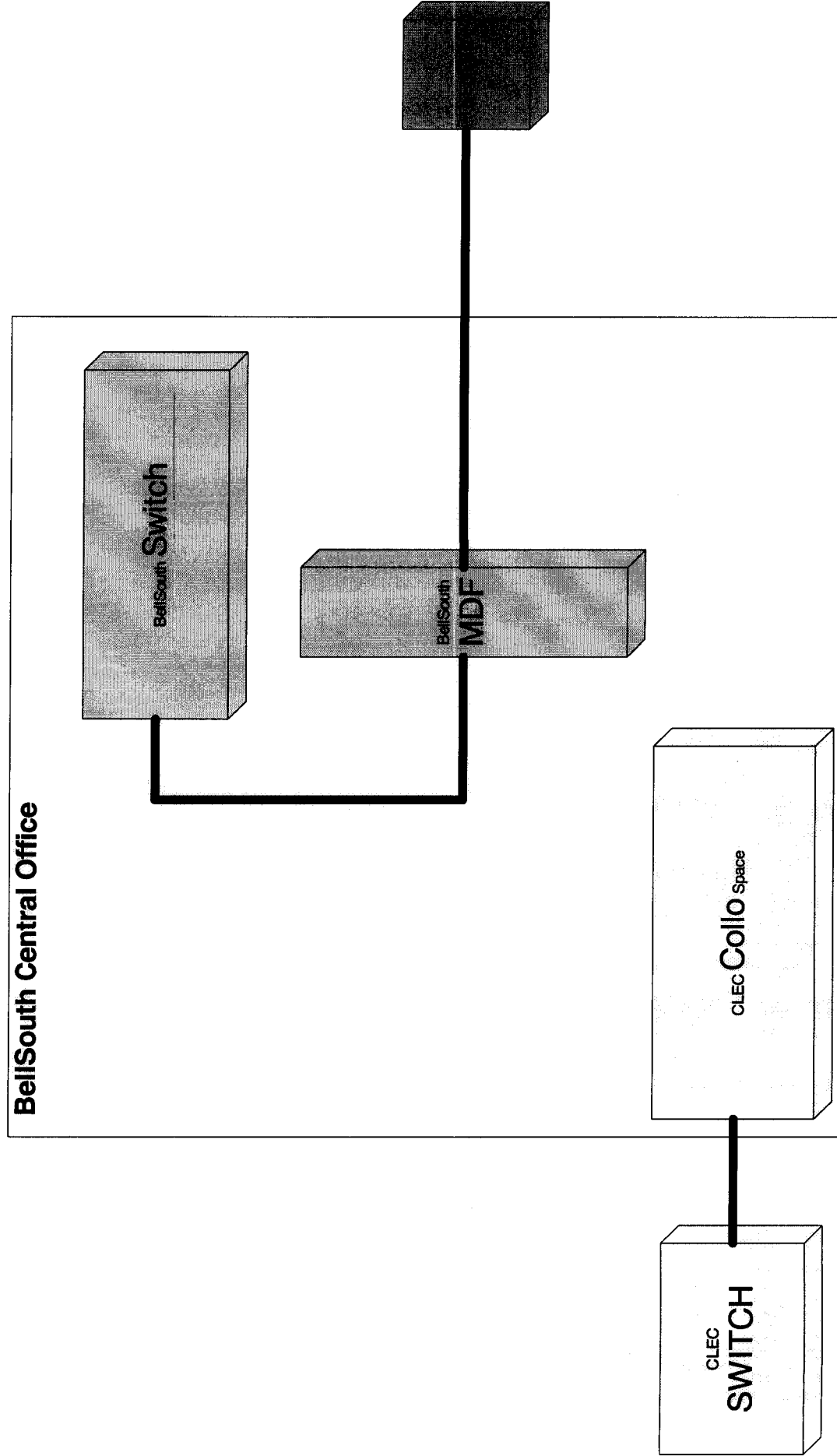


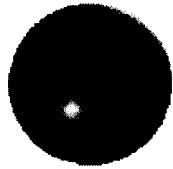
CWINS “Hot Cut” Overview

What Exactly Is A “Hot Cut ?”

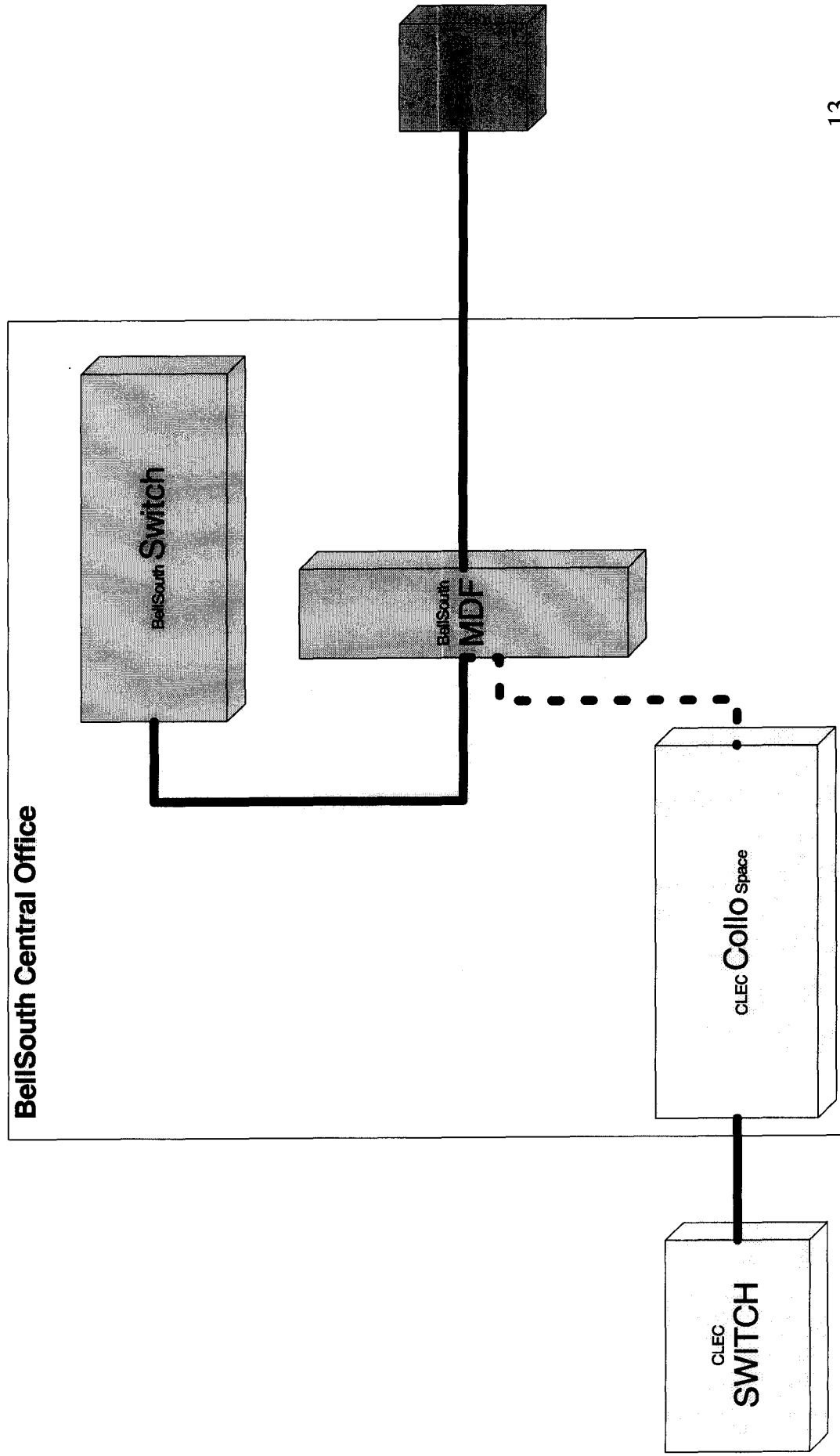


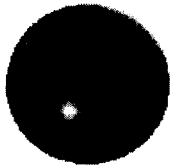
CWINS "Hot Cut" Pre "Hot Cut" Service





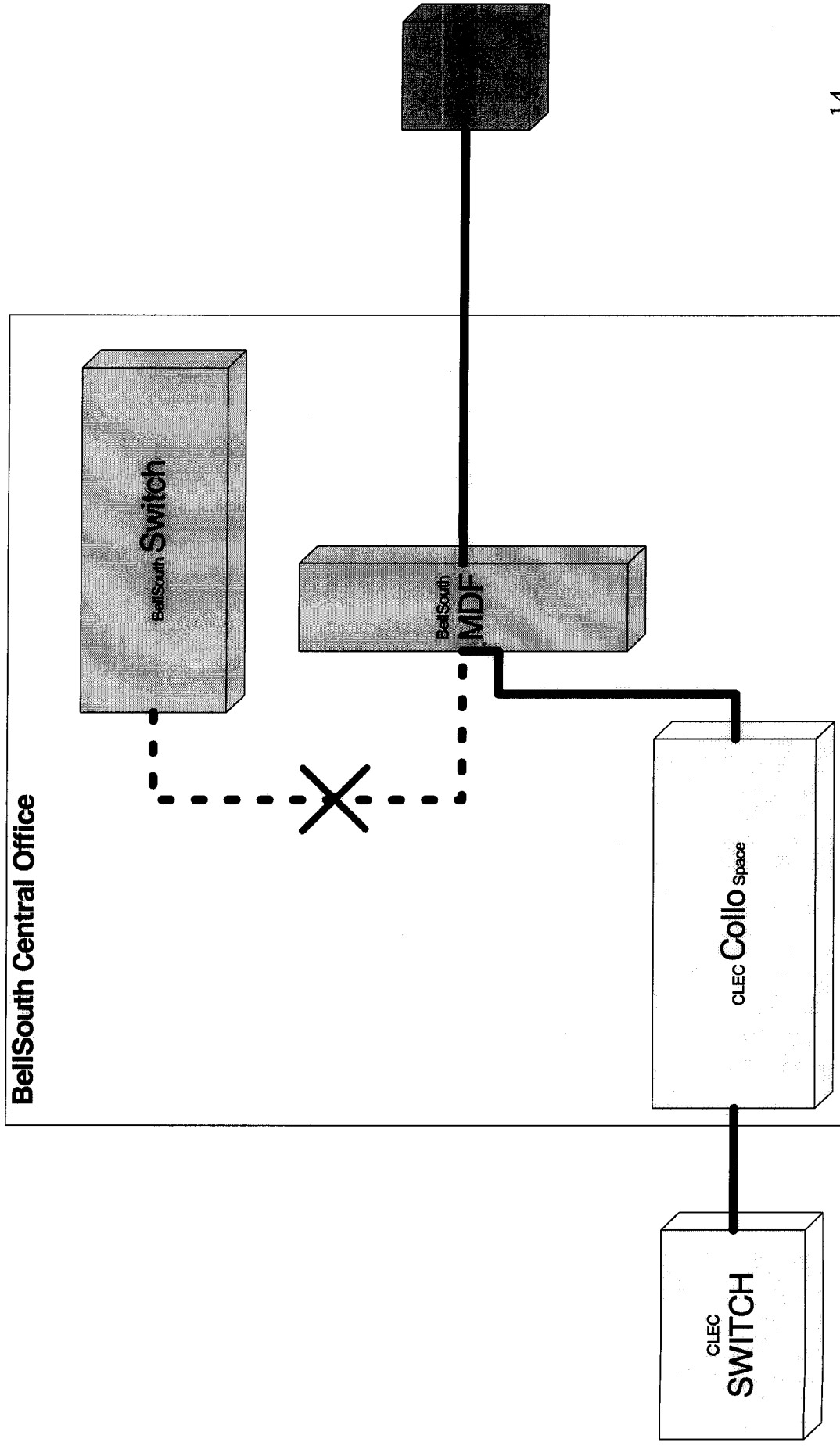
CWINS "Hot Cut" "Hot Cut" Preparation





CWINS "Hot Cut" Post "Hot Cut"

BellSouth Central Office

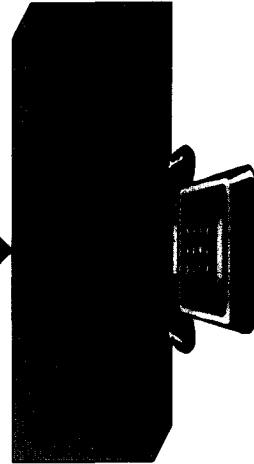


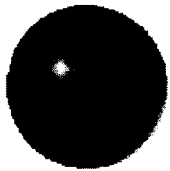
CWINS "Local Number Portability"

Pre Port

Inbound Calls
For
601-961-0798

BellSouth
Central
Office





CWINS “Local Number Portability” CLEC Activation

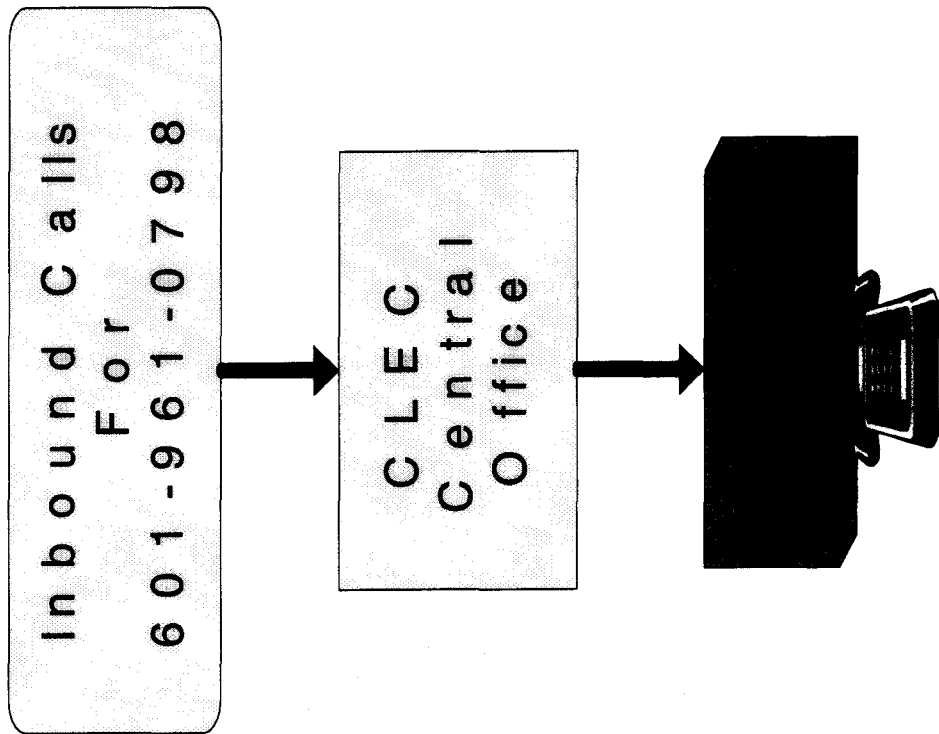
CLEC issues an
Activate Message
to Port TN
601 961-0798

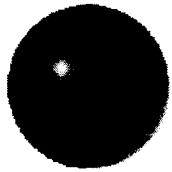


NPAC Activates
Number

CWINS "Local Number Portability"

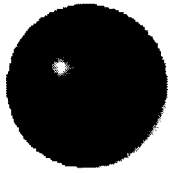
Post Port





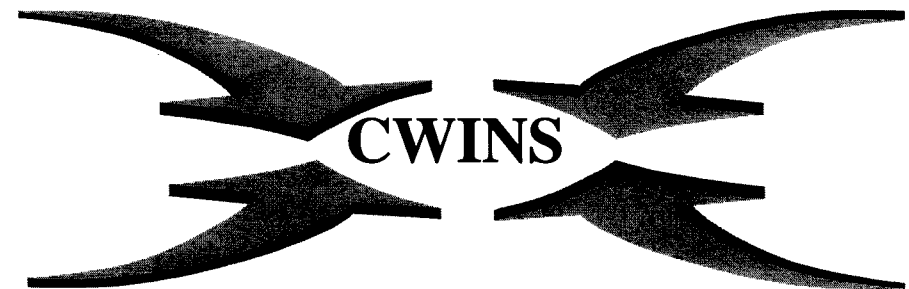
CWINS Provisioning Tools

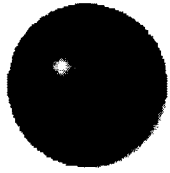
- ***Work Force Administration (WFA)***
- ***Word Document***
- ***Loop Maintenance Operations System (LMOS)***
- ***Service Order Communications System (SOCS)***
- ***Test Capabilities***
 - ***INTAS***
 - ***Switched Access Remote Test System (SARTS)***
 - ***Wiltron***
 - ***Mechanized Loop Test (MLT)***
 - ***Predictor***



CWINS DESIGN MAINTENANCE FUNCTIONS:

- ***Available 24 X 7***
- ***TROUBLE RECEIPT***
- ***ISOLATION TESTING AND ANALYSIS***
- ***TICKET REFERRAL*** (HAND-OFF)
- ***ESCALATION*** (if required)
- ***TURNUP TEST***
- ***CLEC NOTIFICATION & ACCEPTANCE***
- ***TICKET CLOSURE***





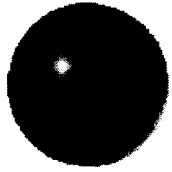
CWINS NON-DESIGN MAINTENANCE FUNCTIONS:

- ***Available 24 X 7***
- ***TROUBLE RECEIPT***
- ***ISOLATION TESTING & ANALYSIS***
- ***TICKET REFERRAL***
- ***ESCALATION*** (if required)
- ***TICKET CLOSURE*** (network responsibility)



CWINS MAINTENANCE Tools :

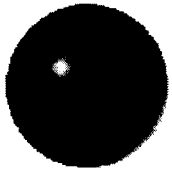
- ***Trouble Analysis Facilitation Interface (TAFI)***
 - ***Non-design TN Formatted Services***
 - ***CLEC Accessibility***
 - ***Utilized by BellSouth Retail Units***
 - ***Mechanized Analysis***
- ***LMOS***
 - ***Non-design (non TN) Formatted Services***
 - ***CLEC accessibility via Electronic Communication Trouble Administration (ECTA)***
 - ***Utilized by BellSouth Retail Units***
- ***WFA***
 - ***Designed Services***
 - ***CLEC Assessable via ECTA***
 - ***Utilized by BellSouth Retail Units***
- ***Test Capability***
 - ***INTAS***
 - ***SARTS***
 - ***Wiltron***
 - ***MLT***
 - ***Predicator***



CWINS Quality Groups

- ***ORDER COMPLETIONS*** QUALITY ASSURANCE GROUP
- ***MAINTENANCE*** QUALITY ASSURANCE GROUP
- ***PROVISIONING*** QUALITY ASSURANCE GROUP
- ***“HOT CUT”*** QUALITY ASSURANCE GROUP
- ***PIT CREW*** QUALITY ASSURANCE GROUP
- **ISO 9002**

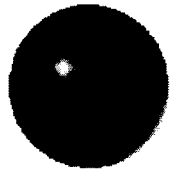




CWINS SPECIALITY GROUPS

- ***PF*** GROUP
- ***CHRONIC*** GROUP
- ***LNP ASSISTANCE*** GROUP
- ***SERVICE ACTIVATION*** GROUP
- ***LOAD CONTROL*** GROUP
- ***RESALE/UNE-P*** MIGRATION GROUP





CWINS Measures of Success

- *“HOT CUT” Performance*
- *XDSL Testing*
- *Provisioning % on time*
 - *Resale*
 - *UNE*
- *Maintenance Duration*
 - *Resale*
 - *UNE*
- *Speed of Answer*





CWINS SUMMARY

- ***CLEC Single Point of Contact*** for the provisioning of coordinated Resale/UNE services and the maintenance of all Resale/UNE services.
- ***Quality Assurance*** processes integrated into Quality Groups
- ***Specialty Groups*** incorporated to enhance processes and provide a positive CLEC experience
- ***Measures of Success***



Acronyms: 1 of 2

Acronym	Definition
AO	Pre-completion Distribution pass of SO
CCSS	Coordinated Cut Scheduling System
CDIA	Corporate Document Information Access
CLEC	Competing Local Exchange Company
CO	Central Office
CRIS	Customer Records Information System
CT	Central Office Tech
CWINS	Customer Wholesale Interconnection Network Services
DD	Due Date
DI	Dispatch In
DO	Dispatch Out
ECTA	Electronic Communication Trouble Administration
ET	Electronic Tech
ISO	International Organization for Standardization
ITS	Integrated Test System
LMOS	Loop Maintenance Operations System
LNP/ILNP	Local Number Portability

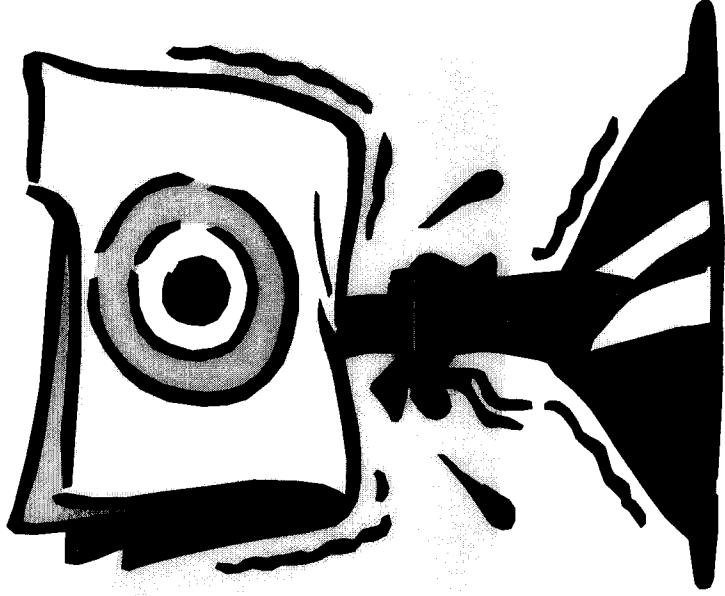
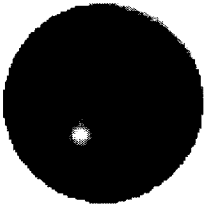


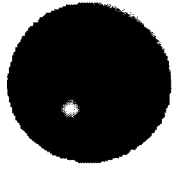
Acronyms: 2 of 2

Acronym	Definition
MA	Maintenance Administrator
MA	Missed Appointment
MARCH	SOAC/MAS INTERFACE SYSTEM
MDF	Main Distribution Frame
MLT	Mechanized Loop Test
OST/ OT	Outside Tech
PD	Pre-completion Distribution pass of SO
PF	Pending Facilities
SARTS	Switched Access Remote Testing System
SD	Subsequent Due Date
SOCS	Service Order Control System
TAFI	Trouble Analysis Facilitation Interface
UNE	Unbundled Network Elements
WFA	Work Force Administration
WFA -C	Work Force Administration/Control
WFA -DI	Work Force Administration/Dispatch In
WILTRON	Test System
WOT	Wired and Office Tested

QUESTIONS ?????

?????





CWINS Tour



Host: OAVP Frank Batusic

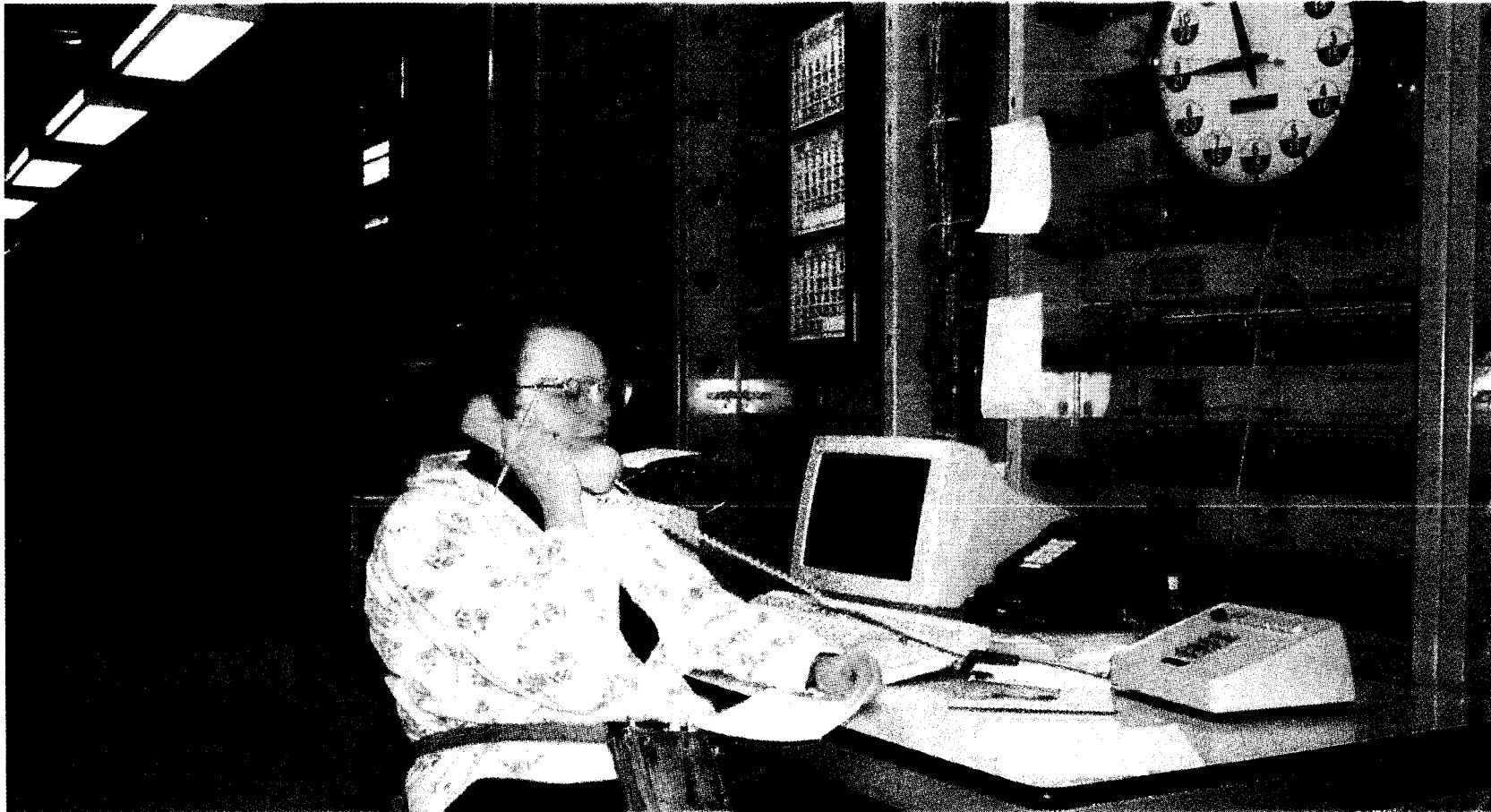
ATTACHMENT D

LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover. Asks for cable pair information.

Exhibit WKM-7

Page 1 of 14



LOOP CUTOVER PROCESS

Step 2: Technician types in cable pair number to obtain order number.

Exhibit WKM-7
Page 2 of 14



LOOP CUTOVER PROCESS

Step 3: Technician retrieves copy of work order.

Exhibit WKM-7

Page 3 of 14



LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to CLEC.

Exhibit WKM-7

Page 4 of 14



LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.



LOOP CUTOVER PROCESS

Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

Exhibit WKM-7

Page 6 of 14



LOOP CUTOVER PROCESS
Step 7: Technician locates precise
location of jumper.

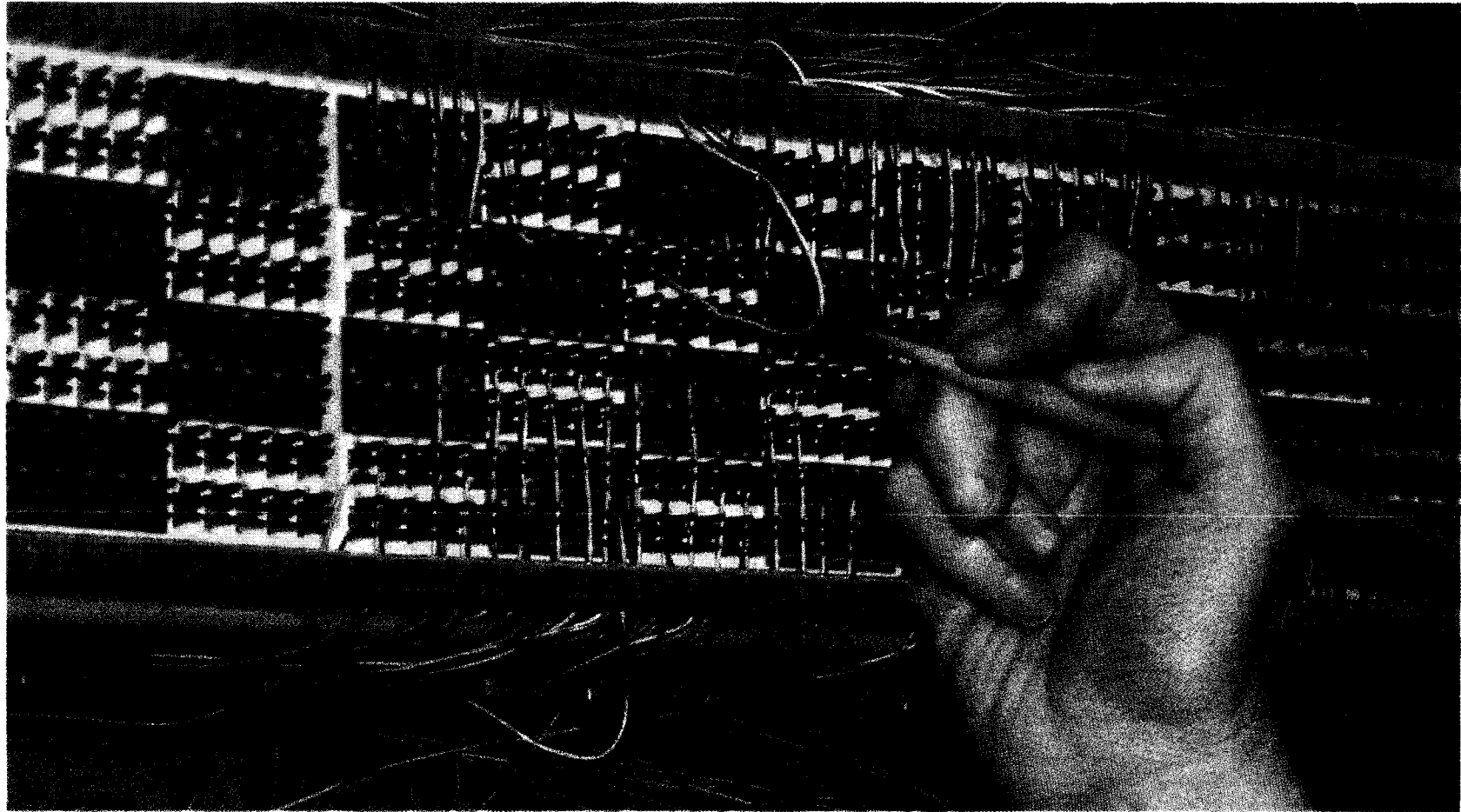


LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.

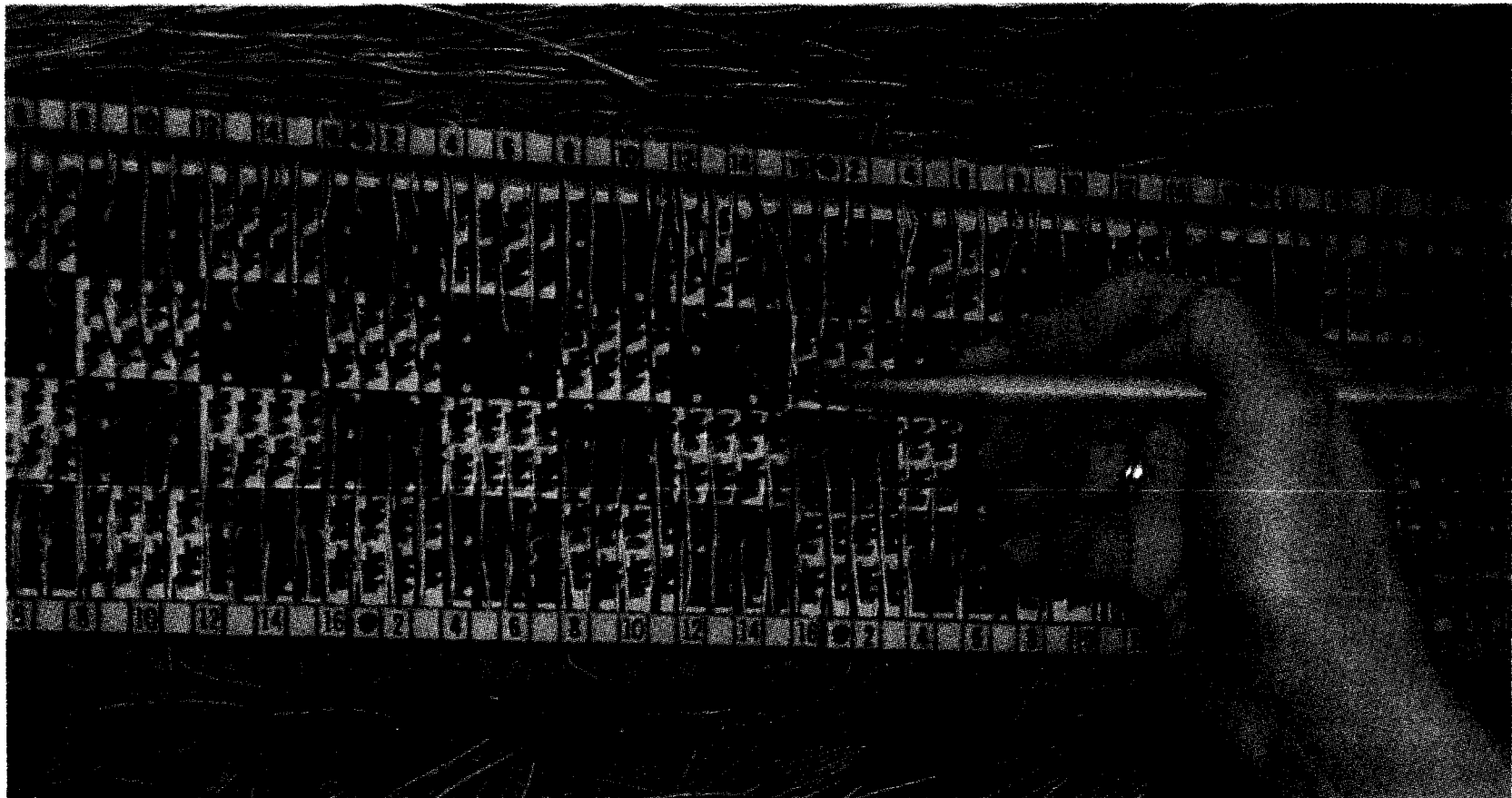
Exhibit WKM-7

Page 8 of 14



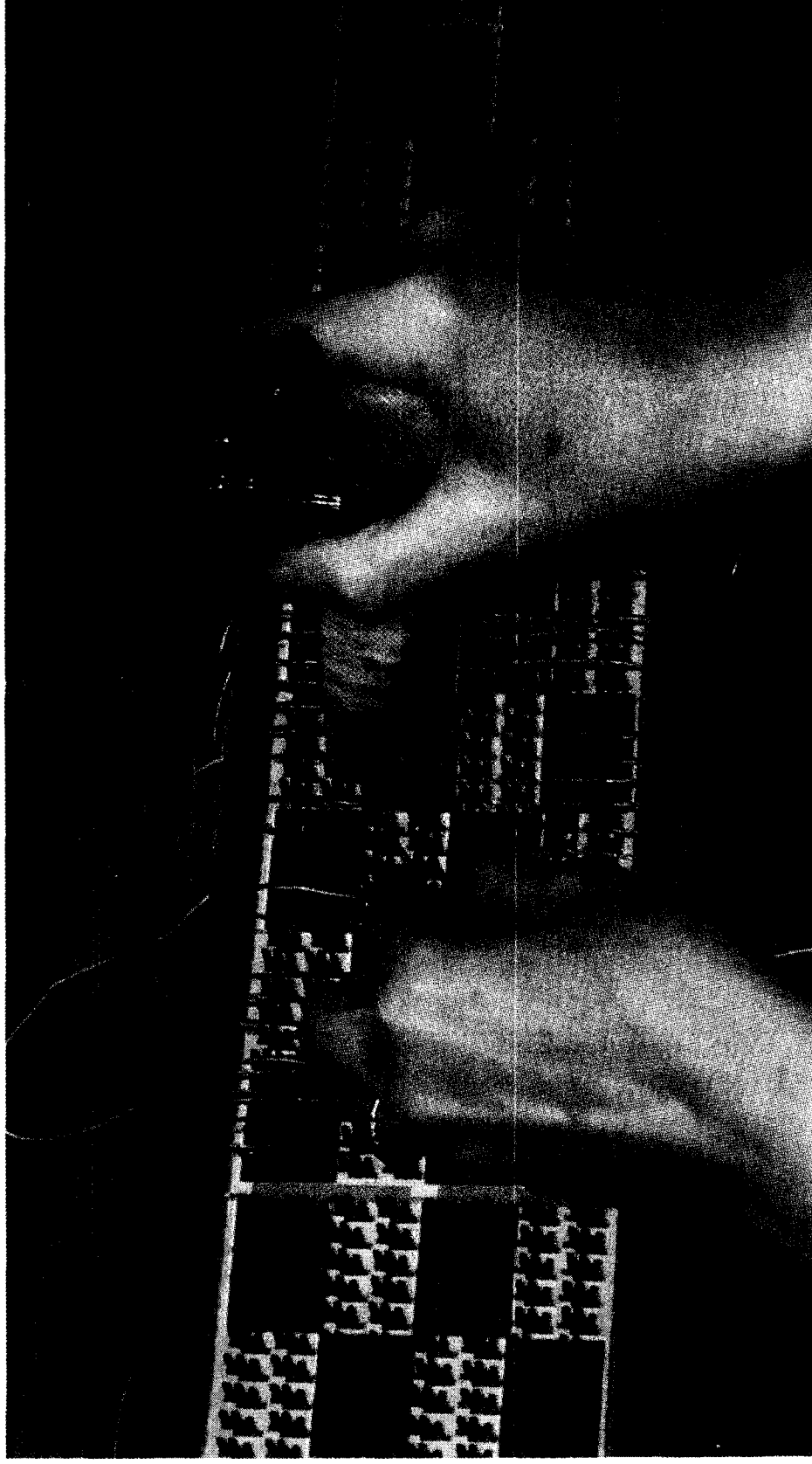
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.

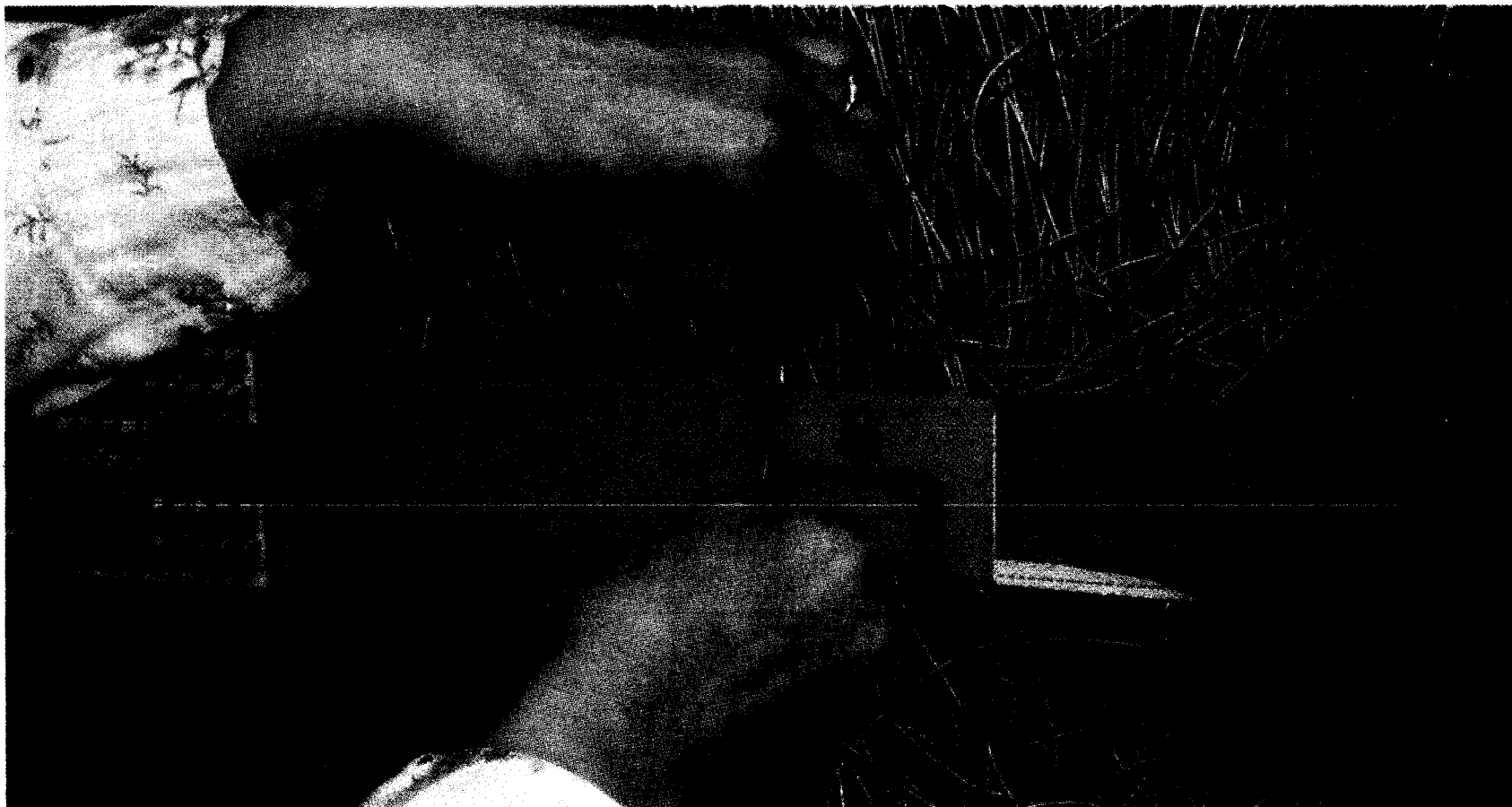


LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to CLEC's collocation equipment.

Exhibit WKM-7

Page 11 of 14



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to CLEC equipment.



LOOP CUTOVER PROCESS

Step 13: Technician conducts ANAC test to verify that loop has been cut to correct CLEC switch port.

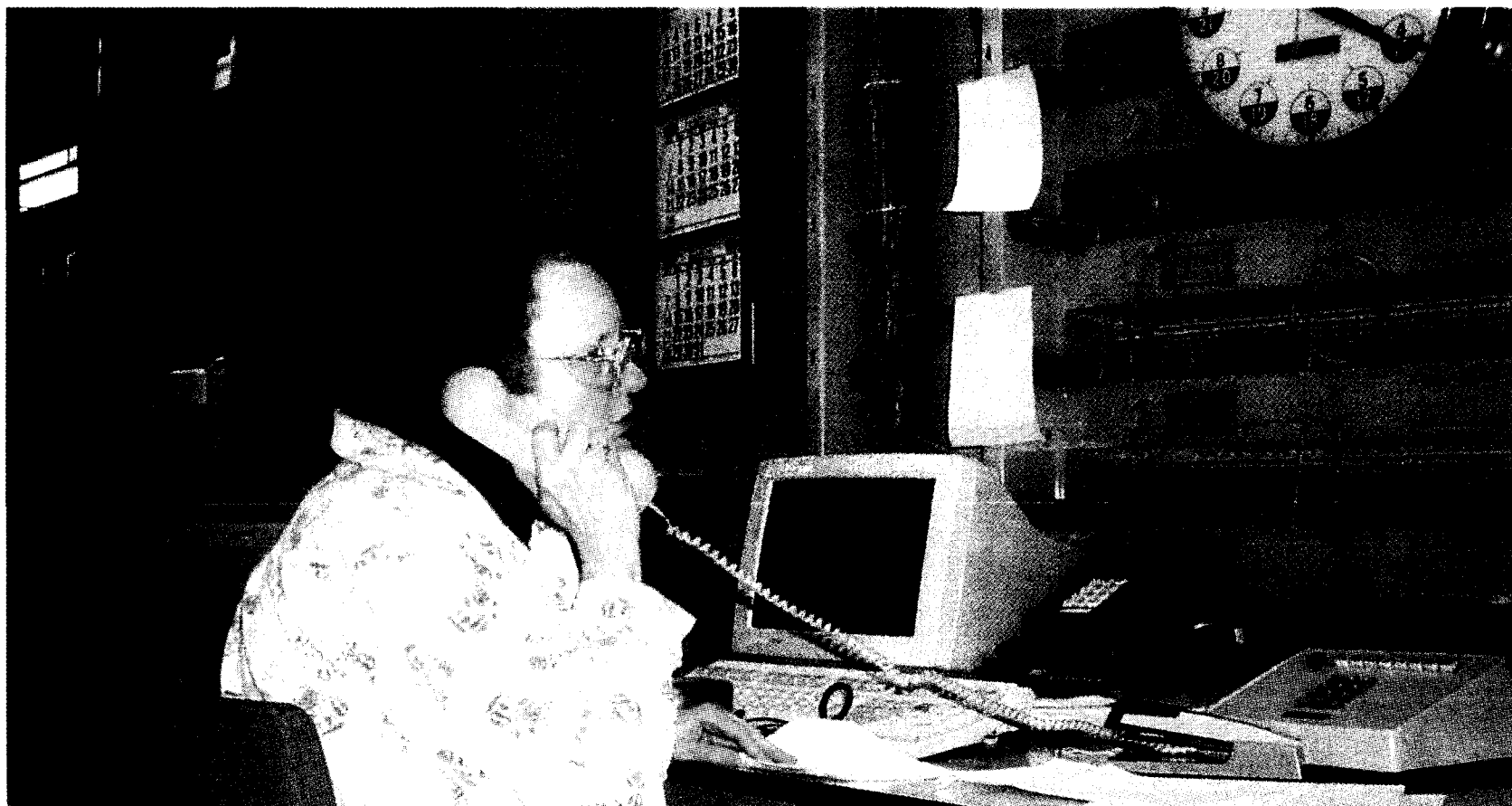
Exhibit WKM-7

Page 13 of 14



LOOP CUTOVER PROCESS

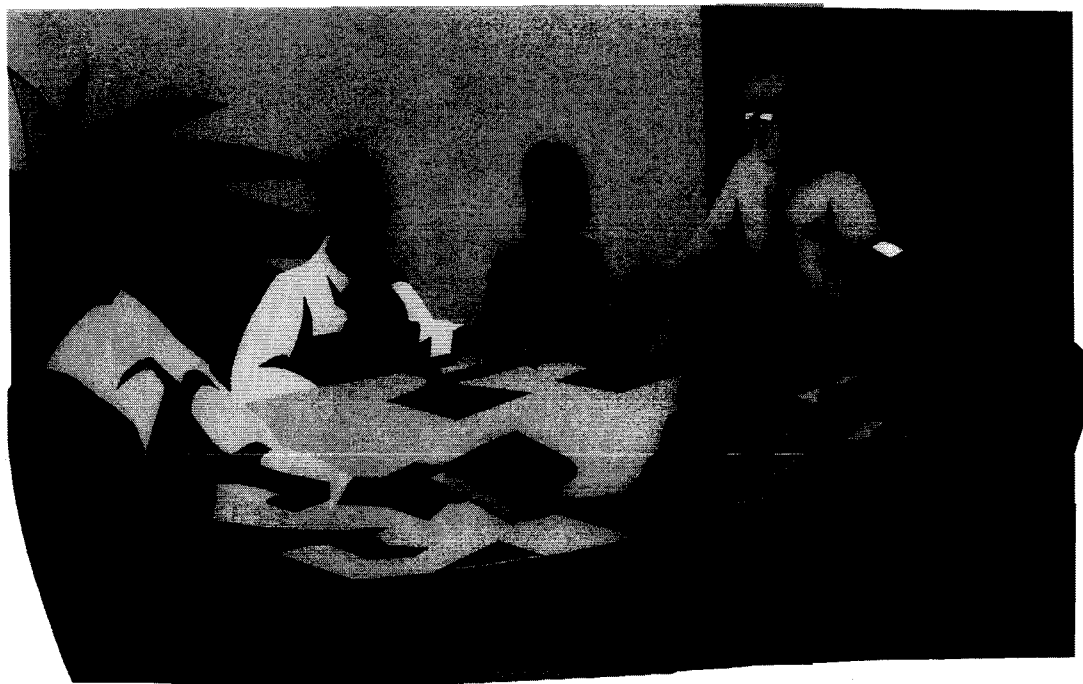
Step 14: Technician verifies cutover with CLEC, closes order, and notifies the UNE Center.



ATTACHMENT E

Local Carrier Service Center (LCSC) Overview

Federal Communications
Commission Staff



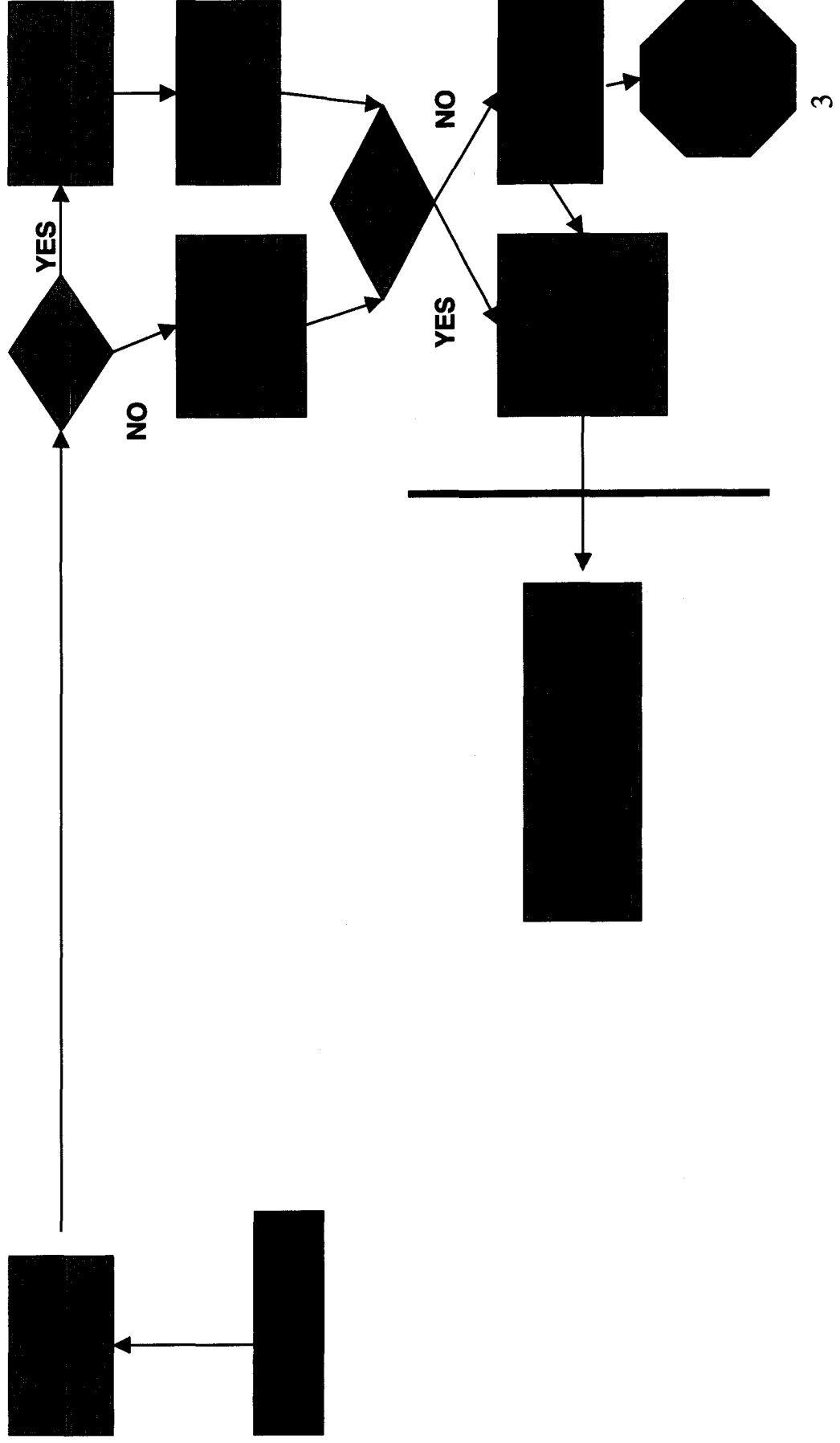
Presented by Janet Miller Fields
October 2, 2002

Overview

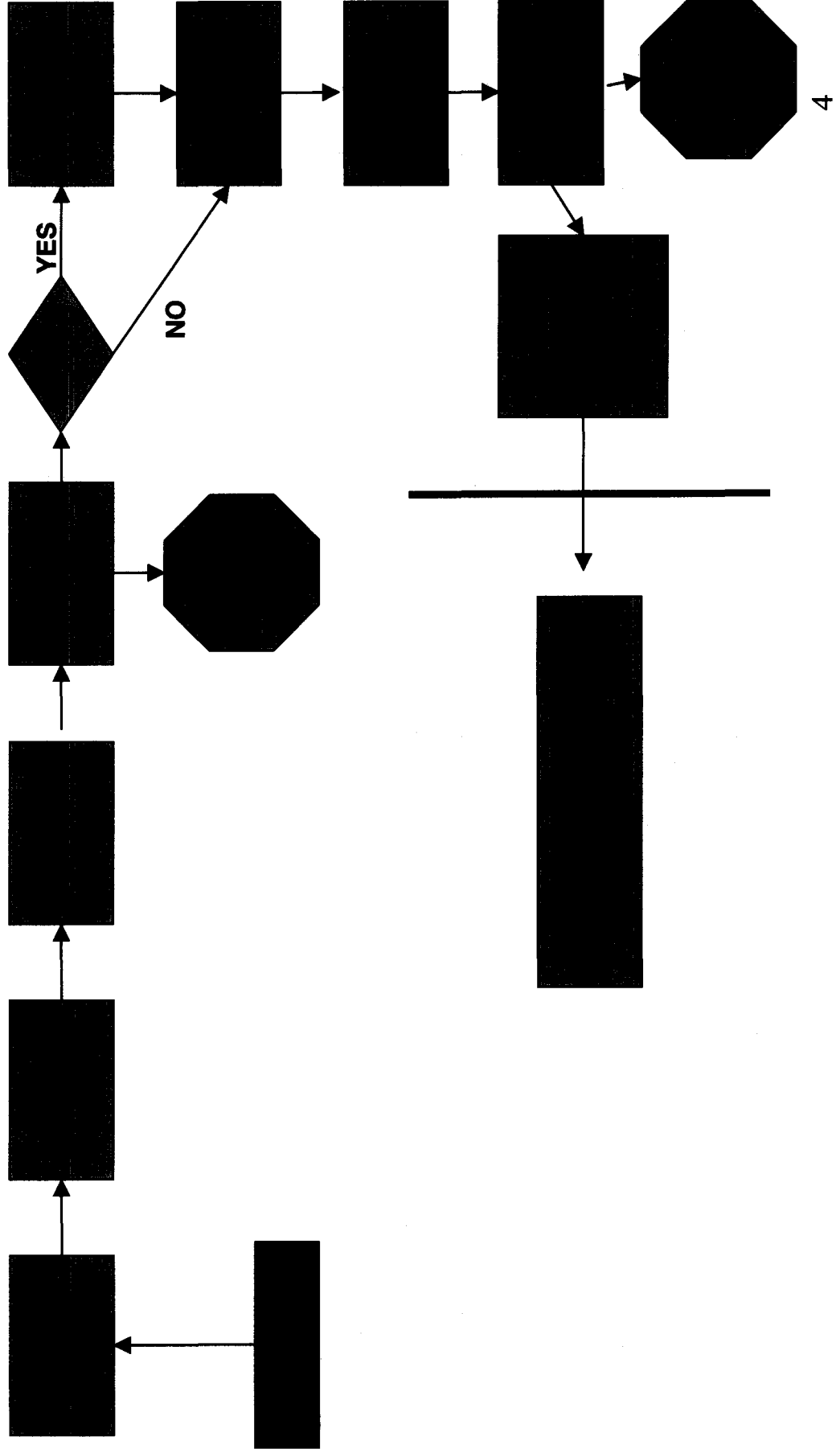
- Electronic Order Flow
- Manual Order Flow
- Organization
- LCSC
- LCSC ABC's
- Acronym Guide



Electronic Order Flow

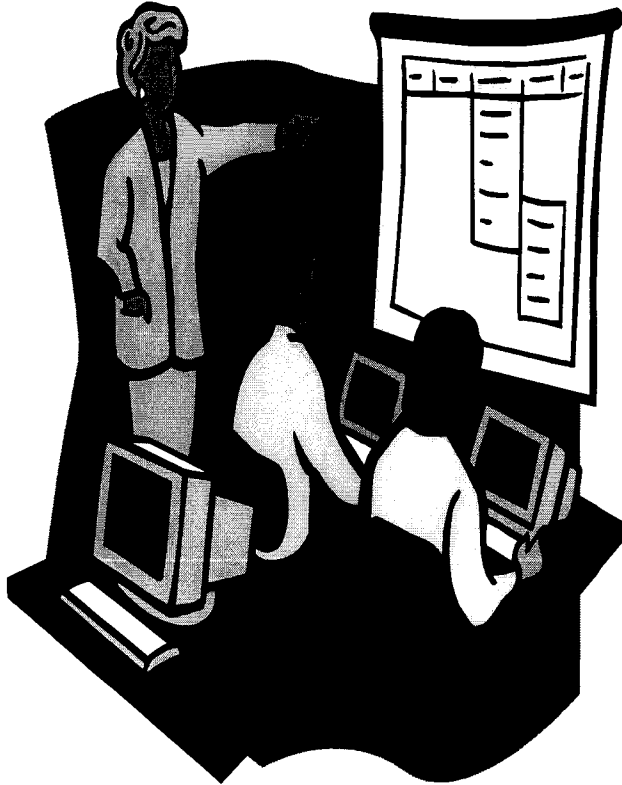


Manual Order Flow



Local Carrier Service Center (LCSC)

Atlanta

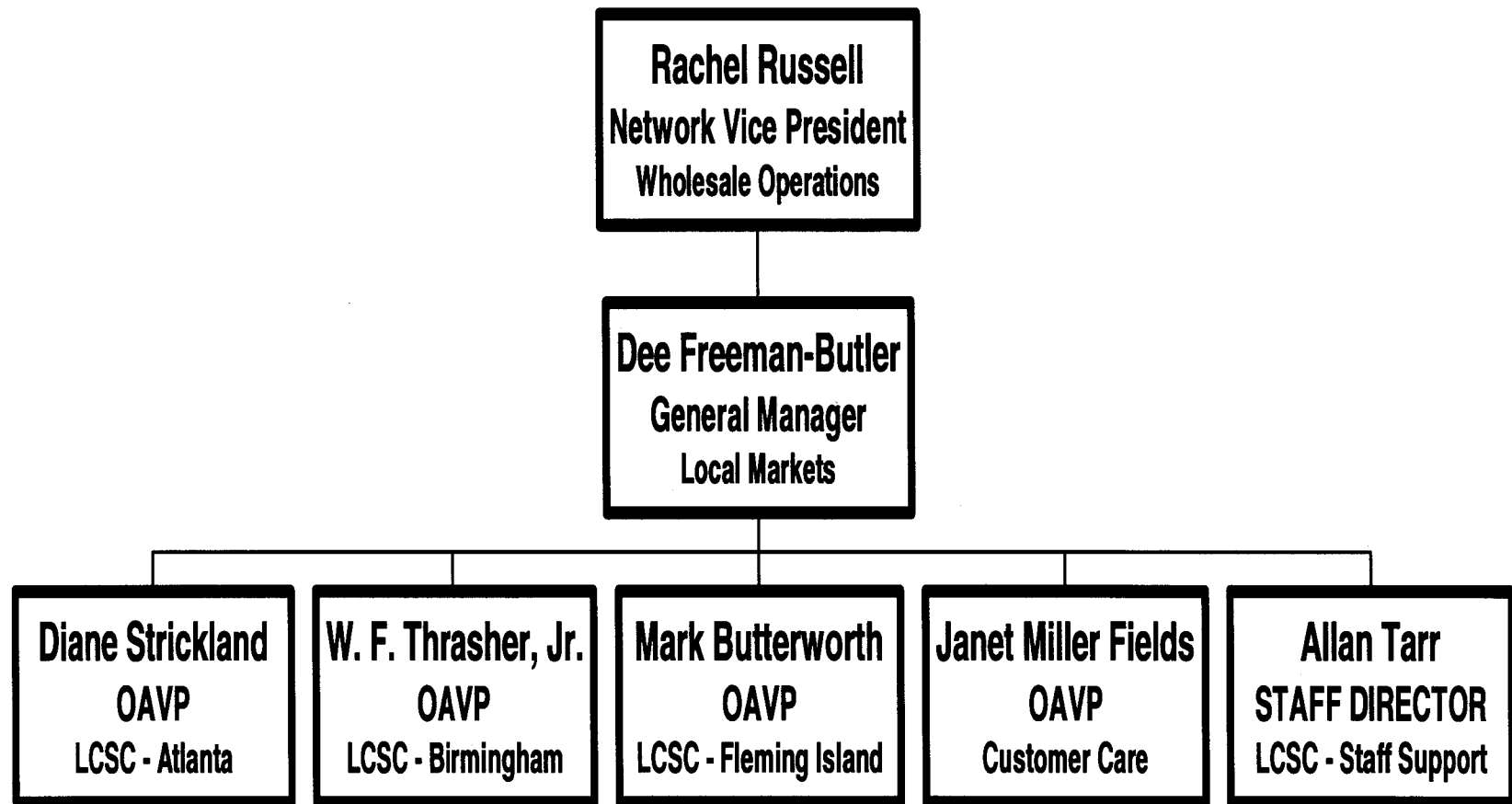


Birmingham
and
Fleming Island

- A regional Center which serves as the Point of Contact for processing partial mechanized and manual Local Service Requests (LSRs) from Competitive Local Exchange Carriers (CLECs)

- Divided into three separate centers to handle three major categories of services:
 - ✓ Resale
 - ✓ Unbundled Network Element (UNE)
 - ✓ Complex

Departmental Organization Chart





LCSC and Staff Personnel 1053 Employees in March to 1164 in August

Operations and Staff	Management	Non Management	Total
Local Carrier Service Centers	101	975	1076
Staff	84	04	88
Total	185	979	1164

LCSC - COMPLEX

*Hours of Operation:

Monday – Friday 8 am – 6 pm

Complex Services are both Resale and Facility based products that are typically large business accounts.

Examples are: Centrex, Integrated Service Digital Network (ISDN), MultiServ, Frame Relay, Complex Number Portability

(*<http://interconnection.bellsouth.com/centers/html/lcsc.html>)

LCSC - Resale

*Hours of Operation:

Fleming Island 7:30 AM – 7:30 PM EDT Monday-Friday
8:00 AM – 5:00 PM EDT Saturday

Resale Services are telecommunications products, features and services that the CLECs purchase from BellSouth and resell to their customers.

Examples are: Plain Old Telephone Service (POTS), calling features like call waiting, and Small Business Services

(* <http://interconnection.bellsouth.com/centers/html/lcsc.html>)

LCSC - UNE

*Hours of Operation:

Fleming Island 8:00 AM – 6:00 PM EDT Monday-Friday

UNE Services include facility-based Loops, Loops with Number Portability, and Number Portability for Non-Complex services.

Examples are: Extended Enhanced Loops (EELs), Line Sharing, Non designed and designed loops

(* <http://interconnection.bellsouth.com/centers/html/lcsc.html>)

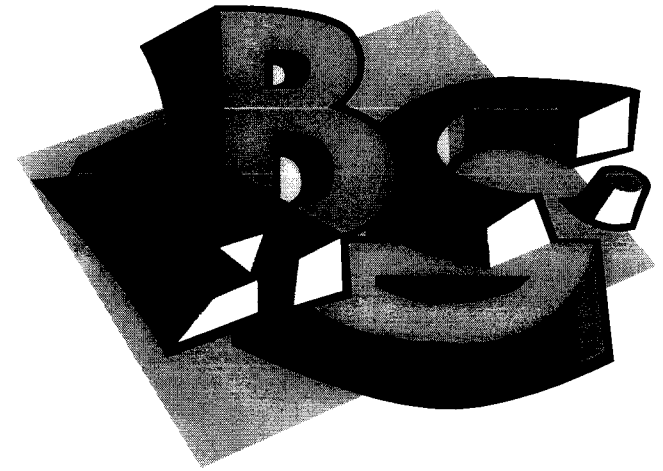
Service Center for all CLECs



Resale & UNE Calls

- **CLEC point of contact (SPOC) in resolving issues, problems, and escalations for partial mechanized and manual orders**
- **Allow Birmingham & Atlanta to concentrate on production**
- **Assist with production**
- **Identify process issues for correction**

LCSC



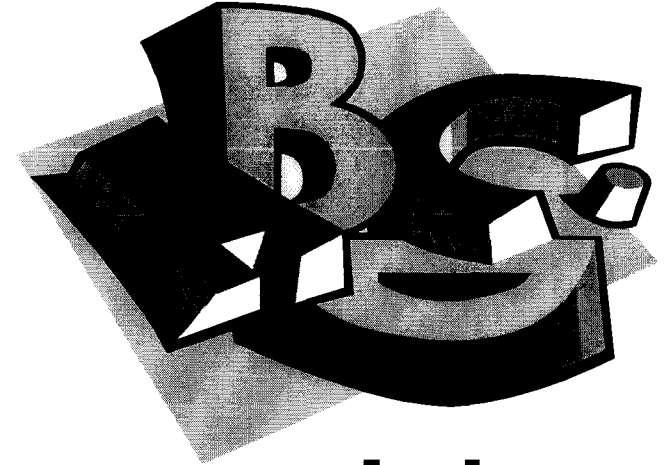
☐ **Contact the following centers**

- Atlanta and Birmingham about complex orders
- Fleming Island about Resale and UNE orders

Call to expedite a due date

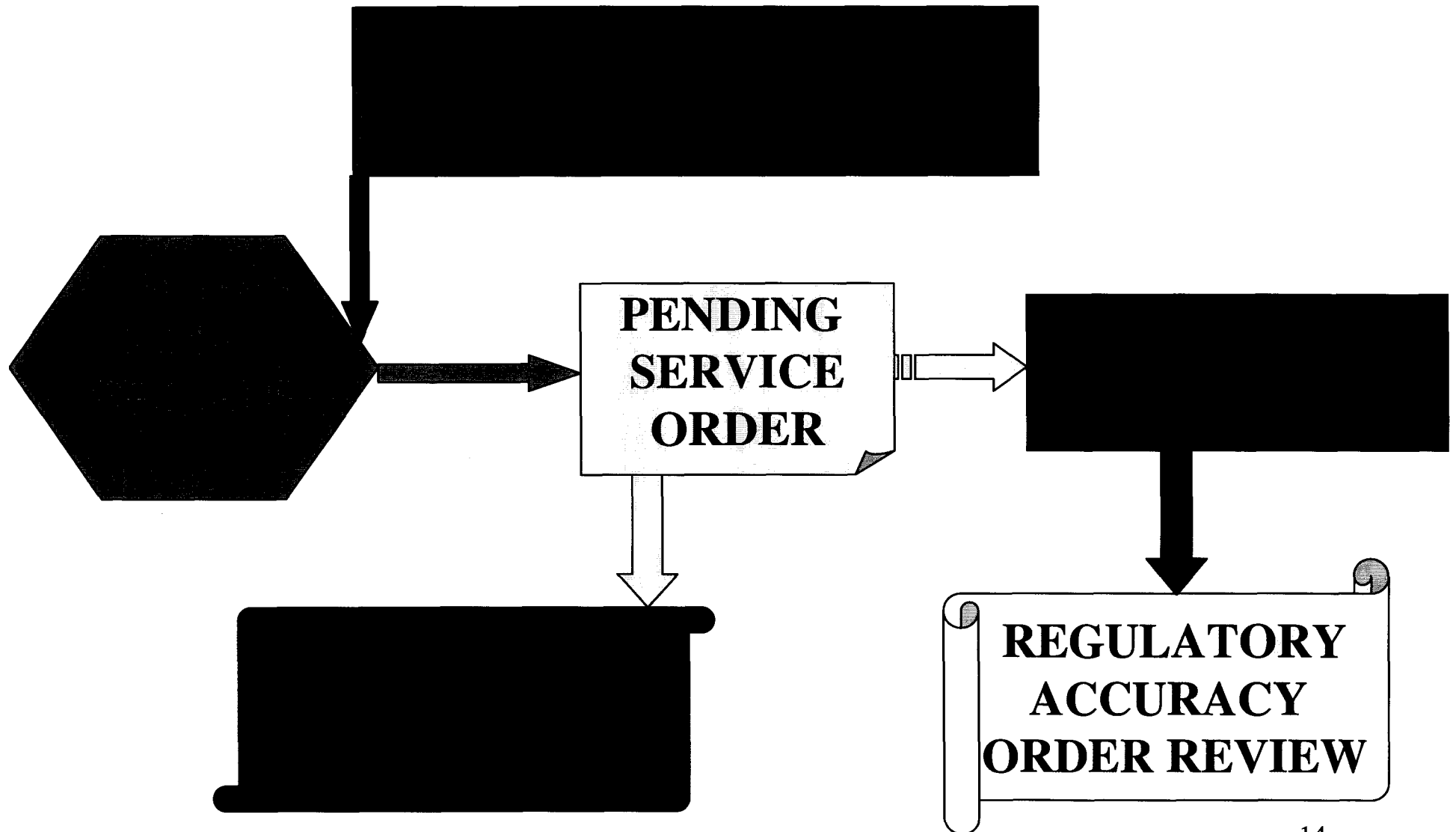
Call for explanation of a clarification

LCSC



- ☐ **Follow the escalation process and give each level person in the process an opportunity to respond to the escalation**
- ☐ **Use Pending Facility (PF) and CLEC Service Order Tracking System (CSOTS) reports and other web based tools for order status information**
- ☐ **Use on line ordering guides and take advantage of training**

Focus on Quality



Focus on Quality



Service Order Review

- Service reps compare a designated number of LSRs per service rep per month to BellSouth pending service orders to ensure orders match LSRs

Resale	20 – 25
UNE	10 – 15
Complex	05 – 07

Focus on Quality

Service Order Review



- Service reps also check manual clarifications for accuracy, validity and completeness
- If the order or clarification is inaccurate, service rep corrects it and sends a referral to manager for rep coverage

Focus on Quality



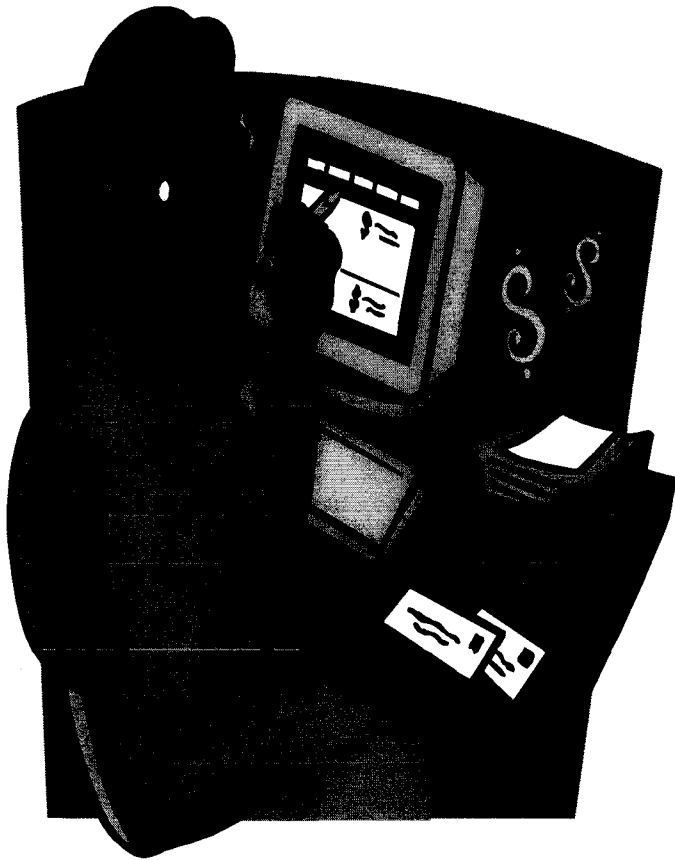
Coaching and Development

Manager compares an average of 3 LSRs per service rep per month to BellSouth pending service orders to ensure orders match LSRs

Service Order Processing system detects service order error and sends a report to the service rep for handling

- Service rep must clear error on day report received

Focus on Quality

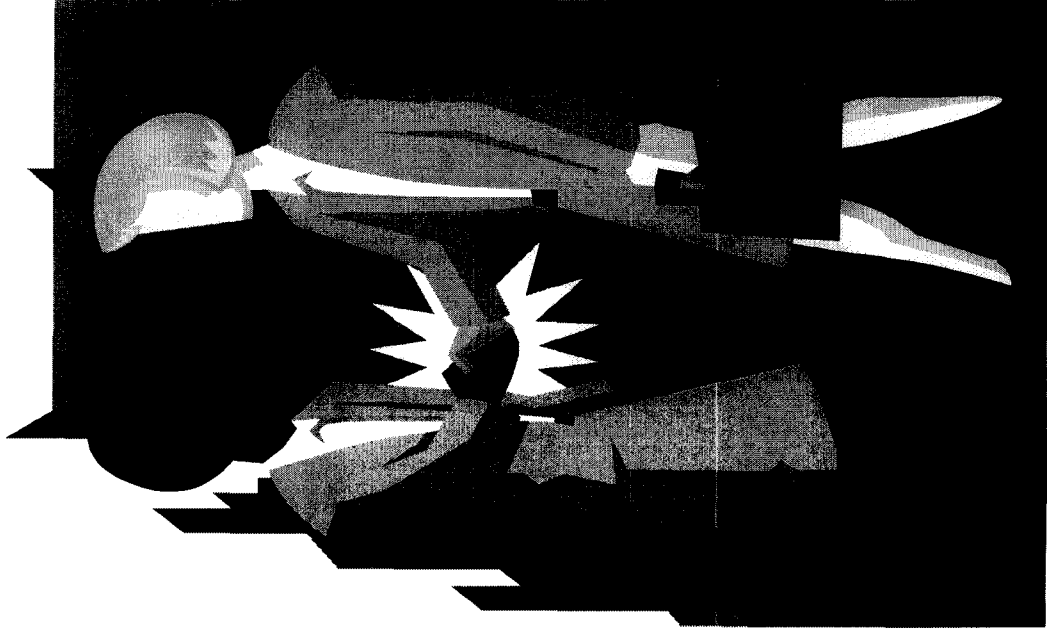


Birmingham

Quality Control Group

- ☐ Ensures completed orders with errors internal to BellSouth systems process to billing system
- ☐ Compares completed orders to LSRs for accuracy
- ☐ Provides official service order accuracy results to regulatory

Customer Care

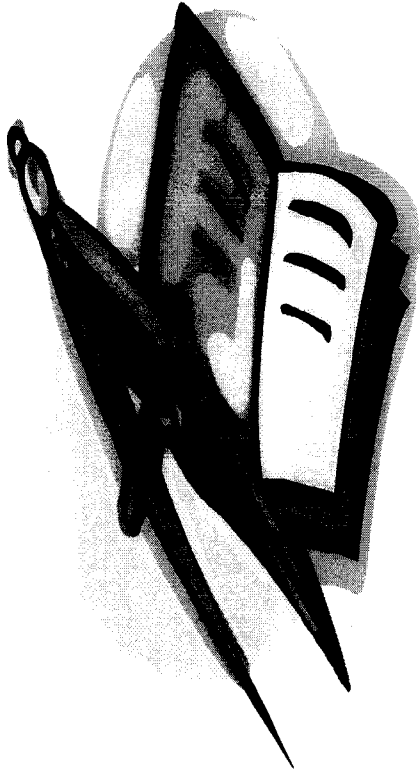


49 Employees

WHAT WE DO

- Project Management
- Customer Support Management
- ✓ SEEMS Support
- Flow Through

LCSC Support Staff



- **Interface between the LCSC and other departments**
- **LCSC representative on CLEC User Forums**
- **Subject Matter Experts (SME), who**

Develop user requirements for specific products and electronic systems

Write methods and procedures for BellSouth and CLEC service representatives

Compile the documentation, provide it in format for electronic publication

39

Employees

Acronym Quick Reference Guide

- CLEC: Competitive Local Exchange Carrier
- EDI: Electronic Data Interchange
- FOC: Firm Order Confirmation
- LAUTO: LSR Automation
- LENS: Local Exchange Navigation System
- LEO: Local Exchange Ordering System
- LESOG: Local Exchange Service Order Generator
- LNP: Local Number Portability
- LON: Local Order Number (also known as Order Tracker)
- LSR: Local Service Request
- PON: Purchase Order Number
- SGG: ServiceGate Gateway
- SOCS: Service Order Communications System
- TAG: Telecommunications Access Gateway

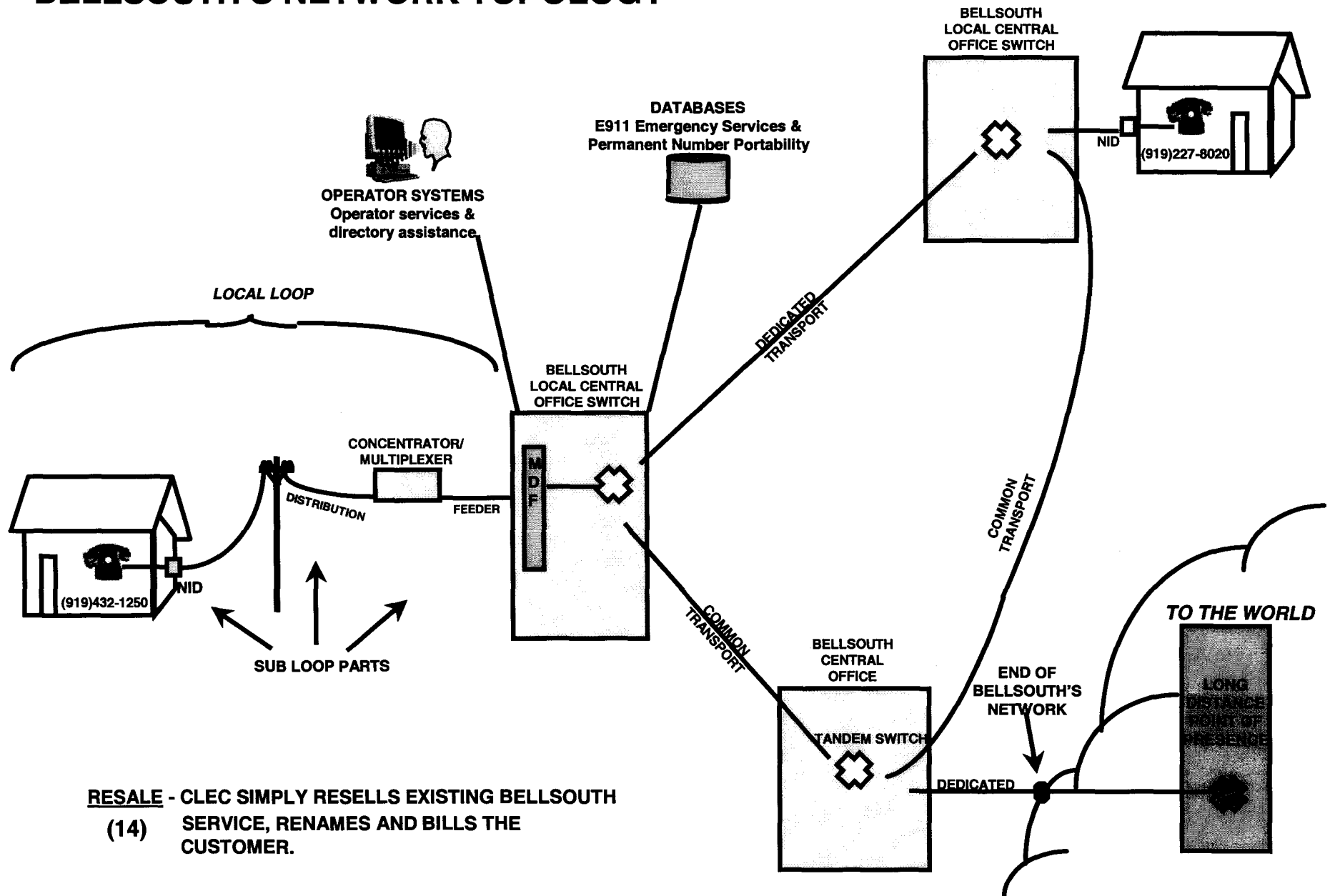
Summary

- Electronic Order Flow
- Manual Order Flow
- Organization
- LCSC
- LCSC ABC's
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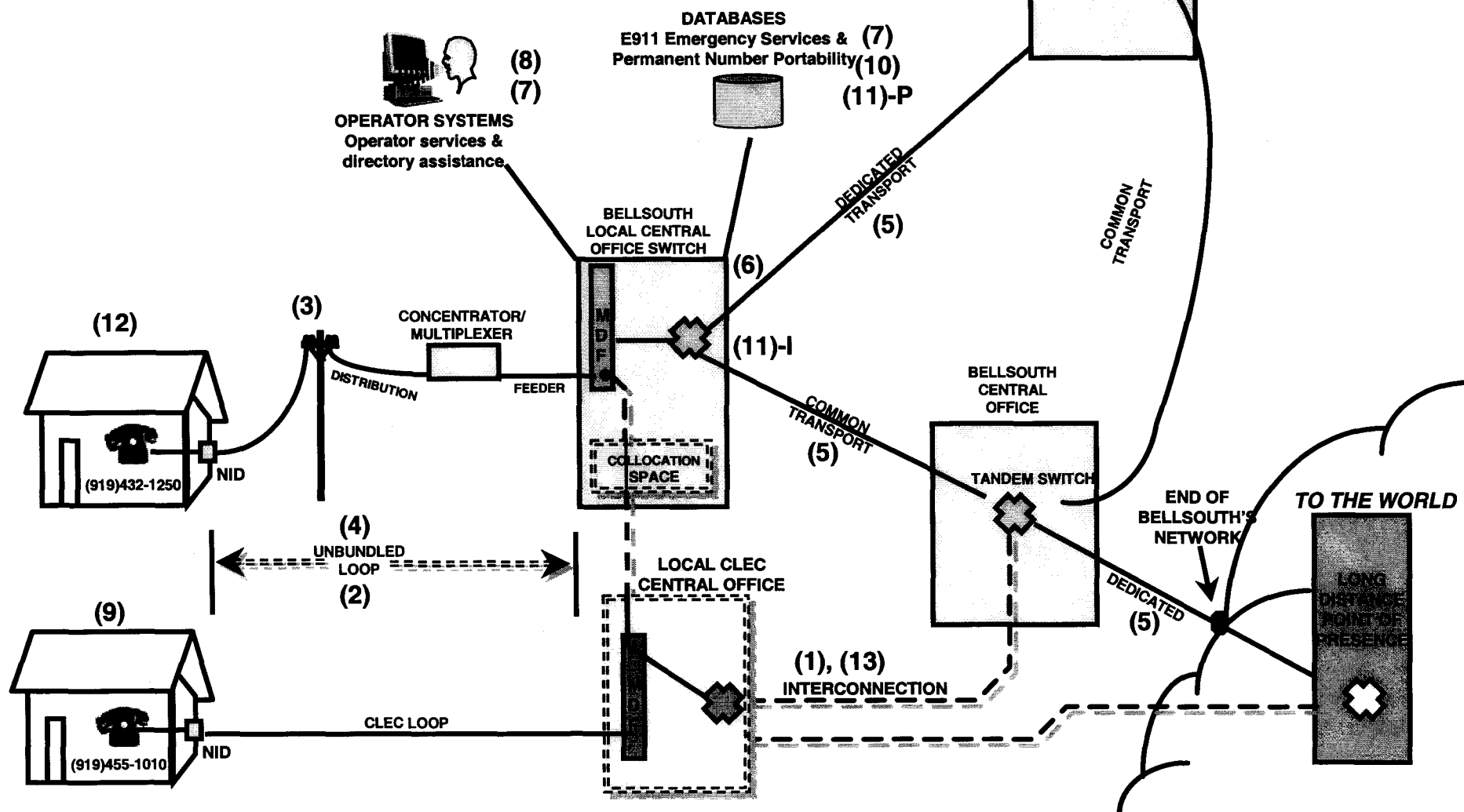


ATTACHMENT F

BELLSOUTH'S NETWORK TOPOLOGY



CLEC FACILITY BASED ARCHITECTURE USING BELL SOUTH UNBUNDLED LOOP WITH COLLOCATION



CLEC FACILITY BASED ARCHITECTURE

